CULTURAL RESOURCES STUDY FOR THE 915 NINTH STREET PROJECT

SAN DIEGO COUNTY, CALIFORNIA

APNs 284-202-21, 284-203-08, 284-205-01, and 284-244-01

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August 22, 2025; Revised December 8, 2025; Revised March 26, 2026; Revised June 26, 2026

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Report Date:	August 22, 2025; Revised December 8, 2025; Revised March 26, 2026; Revised June 26, 2026
Report Title:	Cultural Resources Study for the 915 Ninth Street Project, San Diego County, California (APNs 284-202-21, 284-203-08, 284-205-01, and 284-244-01)
Type of Study:	Phase I Cultural Resources Survey
New Sites:	Temp-1; Iso-1
Updated Site:	P-37-029271
USGS Quadrangle:	Unsectioned portion of former Rancho Valle de Pamo or Santa Maria, Township 13 South, Range 1 East of the USGS *Ramona, California* (7.5-minute) Quadrangle
Acreage:	Approximately 19.65 acres
Key Words:	USGS *Ramona, California* Quadrangle (7.5-minute); archaeological survey; previously recorded single-family residence and barn (P-37-029271); barn and ancillary structures evaluated as not CRHR-eligible; single-family residence evaluated as eligible under CRHR Criterion 3; positive for prehistoric bedrock milling feature (Temp-1) and historic isolate (Iso-1); Iso-1 not CRHR-eligible; additional study and evalutaion of Temp-1 recommended; archaeological and Native American monitoring recommended.

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List of Acronyms

AB	Assembly Bill
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
BERD	Built Environment Resource Directory
BFSA	BFSA Environmental Services, a Perennial Company
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CRHR	California Register of Historical Resources
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
PDS	Planning and Development Services
PRC	Public Resources Code
RPO	Resource Protection Ordinance
SCIC	South Coastal Information Center
SDSU	San Diego State University
SLF	Sacred Lands File
SOI	Secretary of the Interior's
TCP	Traditional Cultural Property
TCR	Tribal Cultural Resource
USGS	United States Geological Survey
YBP	Years Before the Present

MANAGEMENT SUMMARY/ABSTRACT

The following cultural resources study was prepared on behalf of Warmington Residential to assess potential impacts to cultural resources resulting from the proposed development for the 915 Ninth Street Project. This study has been prepared in conformance with the environmental review requirements of the County of San Diego and the statutory requirements of the California Environmental Quality Act (CEQA). The 915 Ninth Street Project is located at 915 Ninth Street in the unincorporated community of Ramona, San Diego County, California. The project encompasses approximately 19.65 acres and includes four parcels identified as Assessor's Parcel Numbers (APNs) 284-202-21, 284-203-08, 284-205-01, and 284-244-01. The project is situated within an unsectioned portion of former Rancho Valle de Pamo or Santa Maria, Township 13 South, Range 1 East of the San Bernardino Baseline and Meridian, on the United States Geological Survey (USGS) *Ramona, California* (7.5-minute) topographic quadrangle. The project proposes a residential subdivision consisting of 88 single-family residential lots and 12 lettered lots for private streets, open space, drainage, water quality, utility, and related infrastructure purposes. Development is proposed on APNs 284-202-21, 284-203-08, and 284-244-01. APN 284-205-01 is not proposed for physical development and would remain as a remainder parcel; however, its allowable residential density is proposed to be transferred to the project. The project is largely undeveloped, with the exception of an existing single-family residence, barn, and four ancillary structures located in the northeastern portion of the property. The existing residence is proposed to remain, while the barn and four ancillary structures would be demolished.

This archaeological investigation was conducted as part of the County of San Diego's environmental review process to locate and record any cultural resources present within the project and subsequently evaluate any resources in compliance with CEQA and County of San Diego guidelines. The archaeological investigation of the project also included a review of an archaeological records search performed at the South Coastal Information Center (SCIC) at San Diego State University (SDSU) in order to assess previous archaeological studies and identify any previously recorded archaeological sites within the project boundaries or in the immediate vicinity. A review of the SCIC records search indicates that 64 cultural resource sites and 67 historic addresses are recorded within a one-mile radius of the project. One cultural resource and one historic address are located within the project, both of which consist of the 915 Ninth Street single-family property recorded as P-37-029271. The SCIC records search results also indicated that 60 cultural resource studies have been conducted within a one-mile radius of the project, one of which includes the project (Carrico and Flanigan 1991). The Carrico and Flanigan (1991) study recorded the 915 Ninth Street single-family residence and barn as P-37-029271 for the Ramona Historic Resources Inventory report. The four ancillary structures were not included in the inventory (Carrico and Flanagan 1991).

BFSA Environmental Services, a Perennial Company (BFSA), requested a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC). The County of San Diego will conduct Native American consultation through the State Assembly Bill (AB) 52

process, if required. A copy of all BFSA Native American correspondence can be found in Appendix D.

The cultural resources survey was conducted on July 29, 2025. The survey was undertaken with the assistance of Gage Baay, a Kumeyaay Native American representative from Redtail Environmental (Redtail). At the time of the survey, most of the subject property was recently cleared and disced, providing excellent ground surface visibility when not hindered by small pockets of vegetation. Within the northeast portion of the project, visibility was limited at times by existing development in the northwest corner of APN 284-203-08. The survey resulted in the identification of one prehistoric bedrock milling feature (Site Temp-1) and one historic well head isolate (Iso-1). As an isolate, Iso-1 is not eligible for the California Register of Historical Resources (CRHR) and therefore does not require further evaluation. However, Site Temp-1 was not evaluated for eligibility to the CRHR or in accordance with the Resource Protection Ordinance (RPO) as part of the current study. Therefore, it is recommended that a focused significance evaluation in accordance with CRHR criteria and the RPO be required for Site Temp-1 prior to the development of the project.

In addition to Site Temp-1 and Iso-1, the survey resulted in the relocation of the historic-age 915 Ninth Street single-family residence and barn recorded as P-37-029271 by Carrico and Flanigan (1991). Four additional ancillary structures associated with the 915 Ninth Street single-family property were also identified, including a water tank house, a pump house, a storage shed and a woodshed. According to the current project design, the barn and ancillary structures will be demolished, and the 915 Ninth Street single-family residence will remain and not be impacted by the proposed project. Nevertheless, due to the potential impacts to the historic property as a whole, the 915 Ninth Street single-family residence, barn, and four ancillary structures were evaluated under the CRHR criteria and the RPO. As a result, the single-family residence was evaluated as eligible for listing on the CRHR under Criterion 3. As previously stated, the single-family residence will not be removed or directly impacted by the proposed project. However, the barn and four ancillary structures were determined to not be significant or CRHR-eligible. Therefore, the removal of the barn and ancillary structures will not negatively impact the CRHR eligibility of the remainder of the 915 Ninth Street property. Therefore, Site P-37-029271 requires no further study, and no mitigation measures are required for the removal of the barn and ancillary structures.

Preservation of the residence through a Use, Maintenance, and Repair Easement is recommended and will allow for continued use of the structure. All future exterior repairs, restoration, or rehabilitation would need to be conducted in accordance with the Secretary of the Interior's (SOI) "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings" (Grimmer 2017). Any modifications made to the structure should be designed by a qualified historical architect and approved by the Director of Planning and Development Services (PDS). The easement would not apply to the interior of the structure.

Regardless of the results of any focused studies of Site Temp-1 within the property, it is recommended that all future grading or earthwork within the project be subject to an archaeological

and tribal monitoring program. Given the uncertainty of prior impact levels to the property, coupled with the property's proximity to natural sources of water and the presence of a prehistoric resource within the project, monitoring of grading is recommended. The monitoring of grading by a qualified archaeologist and a Native American representative will facilitate the identification of inadvertent discoveries and the subsequent evaluation of any archaeological sites. All discoveries must be reported to the County of San Diego, and any proposed significance testing must be approved in advance by the County. Any inadvertent discoveries that are subsequently evaluated as CEQA-significant may require additional mitigation measures to reduce the adverse effects of grading.

A copy of this report will be permanently filed with the SCIC at SDSU. All notes, photographs, and other materials related to this project will be curated at the BFSA archaeological laboratory in Poway, California.

1.0 INTRODUCTION

1.1 Project Description

The 915 Ninth Street Project is located at 915 Ninth Street in the unincorporated community of Ramona, San Diego County, California (Figure 1.1–1). The project encompasses approximately 19.65 acres and includes four parcels identified as APNs 284-202-21, 284-203-08, 284-205-01, and 284-244-01. The project is situated within an unsectioned portion of former Rancho Valle de Pamo or Santa Maria, Township 13 South, Range 1 East of the San Bernardino Baseline and Meridian, on the USGS *Ramona, California* (7.5-minute) topographic quadrangle (Figure 1.1–2).

The project proposes a residential subdivision consisting of 88 single-family residential lots and 12 lettered lots for private streets, open space, drainage, water quality, utility, and related infrastructure purposes (Figure 1.1–3). Development is proposed on APNs 284-202-21, 284-203-08, and 284-244-01. APN 284-205-01 is not proposed for physical development and would remain as a remainder parcel; however, its allowable residential density is proposed to be transferred to the project.

The project is largely undeveloped, with the exception of an existing single-family residence, barn, and four ancillary structures located in the northeastern portion of the property. The existing residence is proposed to remain, while the barn and four ancillary structures would be demolished. Surrounding land uses are primarily residential and include nearby single-family residences and a school.

The project includes construction of single-family homes, internal private streets, sidewalks, utilities, stormwater infrastructure, and associated site improvements. Access to the project would be provided from Ninth Street via a system of private internal streets. The project also includes the proposed vacation of a portion of 10th Street and the installation of a gated Emergency Vehicle Access (EVA) connection.

The project is located within the Ramona Community Plan and includes development within the Village Residential 7.3 (VR-7.3) and Village Residential 2 (VR-2) General Plan land use designations. Water and sewer services would be provided by the Ramona Municipal Water District.

The archaeological study for the project was conducted in order to comply with CEQA and County of San Diego environmental guidelines. The requirement for a cultural resources study is based upon the cultural resource sensitivity of the locality, as suggested by known site density and predictive modeling. Sensitivity for cultural resources in a given area is usually indicated by known settlement patterns, which, in northern San Diego County, are focused around freshwater resources and a food supply. Certainly, the course of the Santa Maria Creek located to the north and east of the project was a key environmental resource that attracted prehistoric populations to this area. The field survey identified one prehistoric resource (Temp-1) and one historic isolate (Iso-1). Site Temp-1 consists of a bedrock milling feature containing three milling slicks and one mortar, and Iso-1 consists of a historic well head. It is recommended that Site Temp-1 be evaluated

under CRHR criteria and the RPO prior to the development of the property.

The 915 Ninth Street single-family property was recorded by Carrico and Flanigan (1991) within the northeast corner of APN 284-203-08 as a single-family residence and barn (Site P-37-029271). The boundaries of the recorded resource also include four associated ancillary structures identified as a water tank house, a pump house, a storage shed, and a woodshed. According to the parcel's building record, the 915 Ninth Street single-family residence was constructed in 1888 and effective by 1890, and the barn was built in 1890. Archival research indicates that the four ancillary structures were constructed between 1900 and 1950. According to the current project design, the 915 Ninth Street barn and four ancillary structures will be demolished. As such, the 915 Ninth Street property will be evaluated under CRHR criteria and the RPO in this report.



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Figure 1.1–1
General Location Map
The 915 Ninth Street Project
Esri World Topographic Map

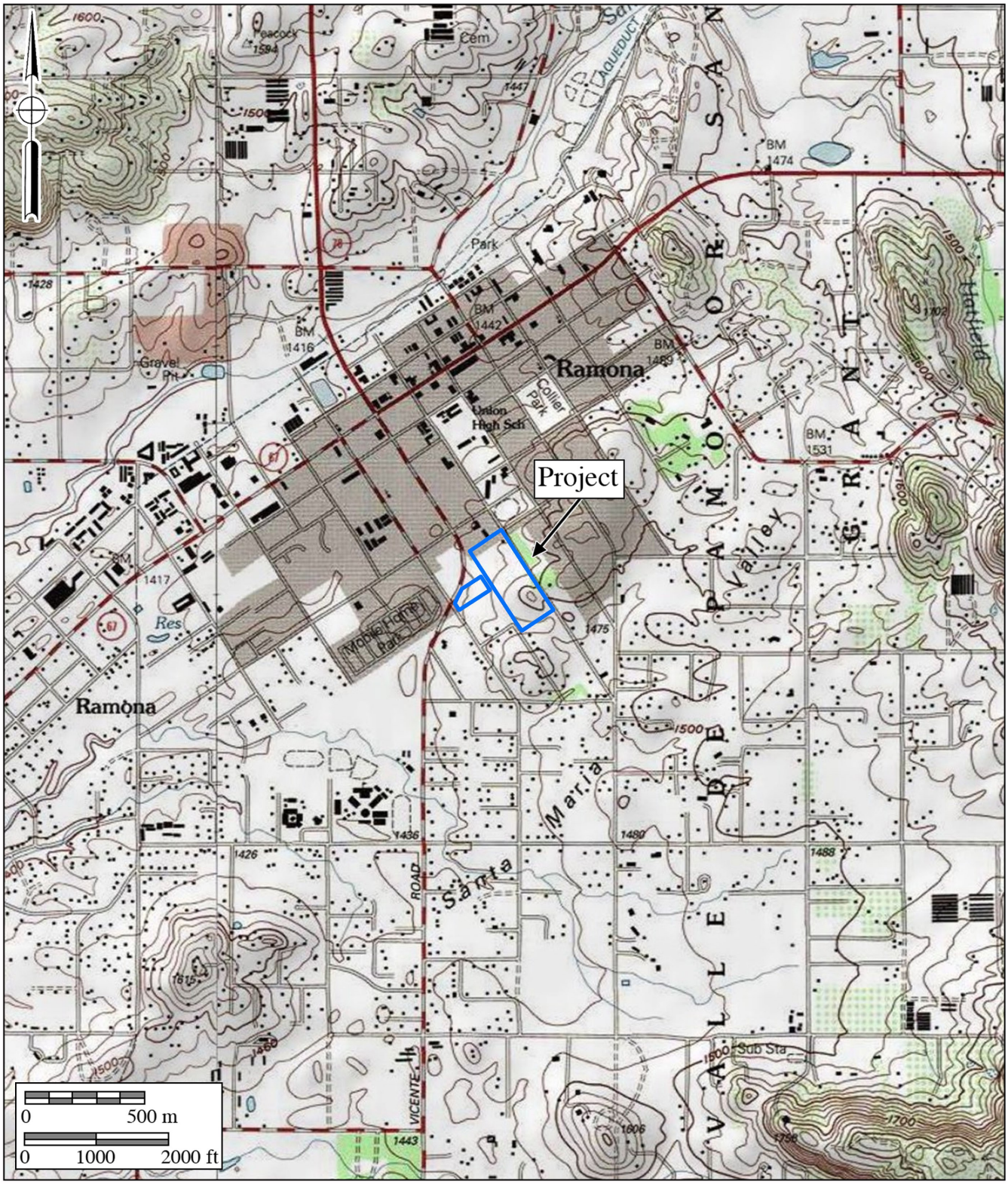


Figure 1.1–2

Project Location Map

The 915 Ninth Street Project

USGS *Ramona* and *San Pasqual* Quadrangles (7.5-minute series)

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Figure 1.1–3
Project Development Map
The 915 Ninth Street Project

1.2 Environmental Setting

The project setting includes the natural, physical, geological, and biological contexts of the proposed project, as well as the cultural setting of prehistoric and historic human activities in the general area. The following sections discuss both the natural and cultural settings at the subject property, the relationship between the two, and the relevance of that relationship to the project.

1.2.1 Natural Setting

The 915 Ninth Street property is located in central San Diego County within the unincorporated community of Ramona. APNs 284-203-08 and 284-244-01 are located south of the intersection of I Street and Ninth Street, and APN 284-202-21 is located east of the intersection of San Vicente Road and Eleventh Street. Currently, the property contains one single-family residence, one barn, and four ancillary structures within the northeast quadrant of APN 284-203-08. The remainder of APN 284-203-08, in addition to APNs 284-244-01 and 284-202-21, consist of vacant fields.

APNs 284-203-08 and 284-202-21, which consist of the northern half of the property, are relatively flat. In APN 284-244-01, the elevation of the property gradually increases southward to form a small hill within the southern half of the project. As such, the average elevation of the property ranges from approximately 1507 feet above mean sea level (AMSL) to 1434 feet AMSL. Geologically, the project is mapped as Cretaceous-aged Japatul Valley Tonalite (Todd et al. 2007). Specific Soils mapped within the project include Fallbrook sandy loam, 9 to 15 percent slopes, eroded (FaD2), and Placentia sandy loam, 2 to 9 percent slopes, warm MAAT, MLRA 19 (PeC) (NRCS 2019).

The project is located within the eastern portion of the Santa Maria Valley, which is nestled at the base of the foothills of Mount Woodson and the Cuyamaca Mountains. The Santa Maria Creek is located approximately 0.6 miles northwest of the subject property. Additional tributaries of the Santa Maria Creek and intermittent streams coming from the surrounding foothills run throughout Ramona and the project vicinity. The biological setting surrounding the project has been impacted by residential development. However, in prehistoric times, the surrounding environment included mixed chaparral, a plant community that provided major food resources for prehistoric inhabitants (Bean and Saubel 1972).

1.2.2 Cultural Setting

Archaeological investigations in San Diego County have documented a diverse and rich record of human occupation spanning the past 10,000 years. The first generally accepted cultural chronology for San Diego County was developed by geographer Malcolm Rogers (1939, 1945). Rogers (1966) initiated the recordation of sites in the area during the 1920s and 1930s, using his field notes to construct the first cultural sequences based upon artifact assemblages and stratigraphy. Subsequent scholars expanded on the information gathered by Rogers and offered more academic interpretations of the prehistoric record. Moriarty (1966, 1967, 1969), Warren (1964, 1966), and True (1958, 1966) all produced seminal works that critically defined the various

prehistoric cultural phenomena present in this region (Moratto 1984).

Additional studies have sought to refine these earlier works (Cardenas 1986; Moratto 1984; Moriarty 1966, 1967; True 1970, 1980, 1986; True and Beemer 1982; True and Pankey 1985; Waugh 1986). In sharp contrast, the current trend in San Diego prehistory has also resulted in a revisionist group that rejects the established cultural historical sequence for the region. This revisionist group (Warren et al. 1998) has replaced the concepts of La Jolla, San Dieguito, and all other manifestations with an extensive, all-encompassing, chronologically undifferentiated cultural unit that ranges from the initial occupation of southern California to circa A.D. 1000 (Bull 1983, 1987; Ezell 1983, 1987; Gallegos 1987; Kyle et al. 1990; Stropes 2007). For the present study, the prehistory of the region is divided into four major periods: Early Man, Paleo Indian, Early Archaic, and Late Prehistoric.

Early Man Period (Prior to 8500 B.C.)

At the present time, there has been no concrete archaeological evidence to support the occupation of San Diego County prior to 10,500 years before the present (YBP). Some archaeologists, such as Carter (1957, 1980) and Minshall (1976), have been proponents of Native American occupation of the region as early as 100,000 YBP. However, their evidence for such claims is sparse and they have lost much support over the years as more precise dating techniques have become available for skeletal remains thought to represent early man in San Diego. In addition, many of the "artifacts" initially identified as products of early man in the region have since been rejected as natural products of geologic activity. Some of the local proposed Early Man Period sites include Texas Street, Mission Valley (San Diego River Valley), Del Mar, La Jolla, Buchanan Canyon, and Brown (Bada et al. 1974; Carter 1957, 1980; Minshall 1976, 1989; Moriarty and Minshall 1972; Reeves 1985; Reeves et al. 1986).

Paleo Indian Period (8500 to 6000 B.C.)

For the region, it is generally accepted that the earliest identifiable culture in the archaeological record is represented by the material remains of the Paleo Indian Period San Dieguito Complex. The San Dieguito Complex was thought to represent the remains of a group of people who occupied sites in this region between 10,500 and 8,000 YBP, and who were related to or contemporaneous with groups in the Great Basin. As of yet, no absolute dates have been forthcoming to support the great age attributed to this cultural phenomenon. The artifacts recovered from San Dieguito Complex sites duplicate the typology attributed to the Western Pluvial Lakes Tradition (Moratto 1984; Davis et al. 1969). These artifacts generally include scrapers, choppers, large bifaces, and large projectile points, with few milling tools. Tools recovered from San Dieguito Complex sites, along with the general pattern of their site locations, led early researchers to believe that the people of the San Dieguito Complex were a wandering hunter/gatherer society (Moriarty 1969; Rogers 1966).

The San Dieguito Complex is the least understood of the cultures that have inhabited the San Diego County region due to an overall lack of stratigraphic information and/or datable

materials recovered from sites identified as belonging to the complex. Currently, controversy exists among researchers regarding the relationship of the San Dieguito Complex and the subsequent cultural manifestation in the area, the La Jolla Complex. Although firm evidence has not been recovered to indicate whether the San Dieguito Complex "evolved" into the La Jolla Complex, the people of the La Jolla Complex moved into the area and assimilated with the people of the San Dieguito Complex, or the people of the San Dieguito Complex retreated from the area due to environmental or cultural pressures.

Early Archaic Period (6000 B.C. to A.D. 0)

Based upon evidence suggesting climatic shifts and archaeologically observable changes in subsistence strategies, a new cultural pattern is believed to have emerged in the San Diego region circa 6000 B.C. Archaeologists believe that this Archaic Period pattern evolved from or replaced the San Dieguito Complex culture, resulting in a pattern referred to as the Encinitas Tradition. In San Diego, the Encinitas Tradition is thought to be represented by the coastal La Jolla Complex and its inland manifestation, the Pauma Complex. The La Jolla Complex is best recognized for its pattern of shell middens and grinding tools closely associated with marine resources and flexed burials (Shumway et al. 1961; Smith and Moriarty 1985). Increasing numbers of inland sites have been identified as dating to the Archaic Period, focusing upon terrestrial subsistence (Cardenas 1986; Smith 1996; Raven-Jennings and Smith 1999a, 1999b).

The tool typology of the La Jolla Complex displays a wide range of sophistication in lithic manufacturing techniques used to create the tools found at their sites. Scrapers, the dominant flaked tool type, were created by either splitting cobbles or by finely flaking quarried material. Evidence suggests that after about 8,200 YBP, milling tools began to appear in La Jolla Complex sites. Inland sites of the Encinitas Tradition (Pauma Complex) exhibit a reduced quantity of marine-related food refuse and contain large quantities of milling tools and food bone. The lithic tool assemblage shifts slightly to encompass the procurement and processing of terrestrial resources, suggesting seasonal migration from the coast to the inland valleys (Smith 1996). At the present time, the transition from the Archaic Period to the Late Prehistoric Period is not well understood. Many questions remain concerning cultural transformation between periods, possibilities of ethnic replacement, and/or a possible hiatus from the western portion of the county.

Late Prehistoric and Ethnographic Periods

The Late Prehistoric Period began at approximately 1,300 YBP. Cremation, ceramics, bow and arrow, small triangular points, the use of Obsidian Butte obsidian, and the reliance upon the acorn as a main food staple are the defining characteristics of the Late Prehistoric Period (Chartkoff and Chartkoff 1984; Gallegos 2002; Moratto 1984). These characteristics are thought to represent the movement of Shoshonean- and Yuman-speaking groups and cultural traits into San Diego, Orange, Riverside, and Los Angeles counties from the southwest and Great Basin. The bow and arrow and buff and brown pottery appear to have spread west from the American Southwest across the Colorado Desert and into southern California (Moratto 1984). Economic systems diversified

and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective milling technologies closer to the coast, such as the bedrock mortar for use in acorn processing.

The ethnographic period began circa A.D. 1769 when Mission San Diego de Alcalá was established. Ethnographic evidence indicates that the Luiseño, Cahuilla, Kumeyaay, and Cupeño occupied San Diego County (Kroeber 1976; Moratto 1984; Shipley 1978).

When contacted by the Spanish in the sixteenth century, the Kumeyaay occupied a territory bounded on the west by the Pacific Ocean, on the east by the Sand Hills, on the north by Agua Hedionda Lagoon, and on the south by Todos Santos Bay in what is now Baja California (Luomala 1978). A series of closely related Yuman-speaking bands crisscrossed this region, divided into northern (Ipai) and southern (Tipai) dialects. Variously referred to in the literature as Tipai-Ipai (Luomala 1978), Diegueño (after the mission at San Diego; Kroeber 1976), or lumped together with other groups under the term Mission Indians, in San Diego County, these people refer to themselves as Kumeyaay.

The disruption of native customs and subsistence complicates the estimation of protohistoric populations and political units. However, the Kumeyaay population was estimated to be between 10,000 and 20,000 at the time of contact, with as many as 85 villages in the southern California/northern Baja California region (Carrico 1986; Luomola 1978; Shipek 1986). The center of the villages contained the ceremonial and political structures, and clusters of residential houses surrounded these structures (Shipek 1982).

Each village community, or rancheria, consisted of a patrilineal band or tribelet that was politically independent and controlled territory over 10 to 30 miles of a particular river or creek drainage (Shipek 1982; Luomala 1978). The resources in each band's territory were controlled by that band and another band could not trespass by gathering plants or hunting game without that band's permission. Bands, which were autonomous tribelets, claimed territorial areas and communally distributed resources such as water, food caches, and agave. Use rights existed, by which families and individuals owned what they made or obtained. Leadership, often inherited, consisted of a clan chief and his assistant(s) and a hunt master. Dance and ceremonial leaders also existed (Luomala 1978). Clans were locally exogamous and patrilocal, so wives came from outside the area (Spier 1923).

Acorns, seeds, rabbits, hares, deer, fish, mollusks, and other marine resources are considered the major food resources of the Kumeyaay (Bancroft 1884; Carrico 1986). A study by Christenson (1990) found that acorns and rabbits meet minimal daily nutritional requirements, but that a broader diet is demonstrated in the ethnographic and archaeological record. The Kumeyaay traveled with the seasons, and unlike earlier inhabitants of the area, built their seasonal cycle around access to acorns and pinyons located in the higher elevations above 4,000 feet. In autumn, western Kumeyaay met with eastern Kumeyaay to harvest acorns, trade, and conduct ceremonies (Christenson 1990; Lee 1937). Winter was spent in sheltered valleys where neither high-elevation cold nor coastal fogs were a problem. Spring subsistence centered on the collection of buds and shoots and the animals that were attracted by them. There was a focus upon ripened grasses and

fruits during the summer. Groups traveled to higher elevations for the harvesting of nut crops during the fall (Luomala 1978). Hunting augmented this vegetal diet, and foothill people visited coastal bands to fish. Large game was not common prey, and only a few men were trained in its procurement; more commonly, rabbits, rodents, snakes, and birds were informally captured (Luomala 1978; Spier 1923). Rabbits were killed communally at times, for in addition to the meat, large quantities of skins were desired for robes.

Kumeyaay structures included dwellings, ramadas, and windbreaks. Dwellings were typically grass-thatched domes over a slight pit. Ramadas and windbreaks protected workplaces, with ramadas shading grinding areas and windbreaks shielding outdoor cooking areas. Conical acorn granaries were also constructed of interwoven willow withes (Spier 1923). Ceremonial shelters were open to the east, facing a dance circle with an outdoor pit (Luomala 1978). Sweathouses were semi-subterranean, pole, and earth-covered structures that contained a fire pit in the center of the floor (Kroeber 1976). Houses were burned following the death of an occupant and former house sites were avoided because of fear of ghost-caused illnesses.

Personal possessions included ground stone tools, pottery of a variety of shapes, sizes, and functions, carrying nets, bows and arrows, throwing sticks, and tobacco pipes. Triangular stone-tipped arrows were used against big game such as deer; otherwise, a sharpened wooden foreshaft sufficed. A hide quiver contained a pottery cup in which extra points were kept. Men carried a sharpened bone dagger from the foreshaft of a deer and women made basket awls of the same material (Spier 1923). Children sometimes had clay dolls. A game was played with stone disks that were 7.5 to 10 centimeters in diameter, where one disk was thrown and then used by the others as a target, much like a modern game of horseshoes (Spier 1923).

Clothing was minimal and was primarily made from willow bark, tules, or sedge. Women wore an apron of corded fiber held in place with a belt of their own hair (Gifford 1931). Men and children typically went naked, although men sometimes wore a waist cord from which they tied objects in order to transport. In cold weather, blankets/robes of rabbit skins or deer hides were worn. Basket hats were worn by both sexes, as well as sandals made from agave or yucca fiber (Spier 1923). Tattoos were popular decorations for both men and women; men also wore deer-shank earrings and a pendant or a tube in the nasal septum.

Crystals were frequently kept for their magical properties and shamans would use them to facilitate communicating with spirits and to determine the cause of illness. Other ceremonial artifacts included deer hoof, gourd, or pottery rattles, ceremonial wands consisting of a hafted leaf-shaped point, eagle, owl, and raven feathers, wooden flutes, soapstone mortars, and pestles for jimsonweed preparation, and crescent-shaped stones for use in female puberty ceremonies (Spier 1923; Waterman 1910). Projectile points sometimes also served ceremonial functions. Points were placed under rocks around camps to prevent bewitching and were sometimes worn on a cord around the neck by shamans during dances for the same reason (Spier 1923). Possessions were not inherited; all were burned at the death of an individual or as a part of the yearly *keruk* mourning ceremony. Generally, missionization for Kumeyaay was less swift than in other areas, owing to sustained resistance (Luomola 1978). The Kumeyaay established a pueblo in the San Pasqual

Valley in 1835, defending itself from attacks by the Quechan through the mid-1800s. By this time wagon roads through the valley were being established between the various ranchos and the mission of Santa Ysabel Asistencia.

In 1846, the Battle of San Pasqual was fought in the valley near the site of the Kumeyaay pueblo of San Pasqual. The defeat of the Californios ultimately opened the road to San Diego from the Southern Emigrant Trail. As cattle ranching and farming in inland San Diego County became more prevalent after 1850, many native plants and animals were eliminated or their populations were severely restricted, which disrupted food resources typically utilized by native peoples. In 1878, the Kumeyaay of San Pasqual pueblo were evicted from their homes by San Diego County authorities.

Native American Perspective

In addition to the point of view discussed above, it is acknowledged herein that other perspectives exist to explain the presence of Native Americans in the region. The Native American perspective is that they have been here from the beginning, as described by their oral histories. Similarly, they do not necessarily agree with the distinction made between different archaeological cultures or periods, such as "La Jolla" or "San Dieguito." Instead, they believe that there is a continuum of ancestry, from the first people to the present Native American populations of San Diego County.

Historic Period

Exploration Period (1530 to 1769)

The historic period around San Diego Bay began with the landing of Juan Rodríguez Cabrillo and his men in 1542 (Chapman 1921). Sixty years after the Cabrillo expeditions (1602 to 1603), an expedition under Sebastián Vizcaíno made an extensive and thorough exploration of the Pacific coast. Although his voyage did not extend beyond the northern limits of the Cabrillo track, Vizcaíno had the most lasting effect upon the nomenclature of the coast. Many of Vizcaíno's assigned place names throughout the region have survived to the present time, whereas nearly all of Cabrillo's have faded from use. For example, Cabrillo gave the name "San Miguel" to the first port at which he stopped in what is now the United States; 60 years later, Vizcaíno changed the port name to "San Diego" (Rolle 1969).

Spanish Colonial Period (1769 to 1821)

The Spanish occupation of the claimed territory of Alta California took place during the reign of King Carlos III of Spain (Engelhardt 1920). Jose de Gálvez, a powerful representative of the king in Mexico, conceived the plan to colonize Alta California and thereby secure the area for the Spanish (Rolle 1969). The effort involved both military and religious components, with the overall intent of establishing forts and missions to gain control of the land and the native inhabitants through conversion. Actual colonization of the San Diego area began on July 16, 1769, when the first Spanish exploring party, commanded by Gaspar de Portolá (with Father Junípero

Serra in charge of religious conversion of the native populations), arrived by the overland route to San Diego to secure California for the Spanish (Palou 1926). The natural attraction of the harbor at San Diego and the establishment of a military presence in the area solidified the importance of San Diego to the Spanish colonization of the region and the growth of the civilian population.

Missions were constructed from San Diego to the area as far north as San Francisco. The mission locations were based upon important territorial, military, and religious considerations. Grants of land were made to those who applied, but many tracts reverted back to the government due to lack of use. As an extension of territorial control by the Spanish Empire, each mission was placed so as to command as much territory and as large a population as possible. While primary access to California during the Spanish Period was by sea, the route of El Camino Real served as the land route for transportation, commercial, and military activities within the colony. This route was considered the most direct path between the missions (Rolle 1969; Caughey 1970). As increasing numbers of Spanish and Mexican peoples, and the later Americans during the Gold Rush, settled in the area, Native American populations diminished as they were displaced or decimated by disease (Carrico and Taylor 1983).

Mexican Period (1821 to 1846)

On September 16, 1810, the priest Father Miguel Hidalgo y Costilla started a revolt against Spanish rule. He and his untrained Native American followers fought against the Spanish, but Father Hidalgo's revolt was unsuccessful, and he was executed. After this setback, Father José Morales led the revolutionaries, but he too failed and was executed. These two men are still symbols of Mexican liberty and patriotism. After the Mexican-born Spanish and the Catholic Church joined the revolution, Spain was finally defeated in 1821. Mexican Independence Day is celebrated on September 16 of each year, signifying the anniversary of the start of Father Hidalgo's revolt. The revolution had repercussions in the northern territories and, by 1834, all of the mission lands had been removed from the control of the Franciscan Order under the Acts of Secularization. Without proper maintenance, the missions quickly began to disintegrate, and after 1836, missionaries ceased to make regular visits inland to minister to the Native Americans (Engelhardt 1920). Large tracts of land continued to be granted to those who applied or who had gained favor with the Mexican government. Grants of land were also made to settle government debts, and the Mexican government was called upon to reaffirm some older Spanish land grants shortly before the Mexican-American War of 1846 (Moyer 1969).

Anglo-American Period (1846 to Present)

California was invaded by United States troops during the Mexican-American War from 1846 to 1848. The acquisition of strategic Pacific ports and California land was one of the principal objectives of the war (Price 1967). At the time, the inhabitants of California were practically defenseless, and they quickly surrendered to the United States Navy in July 1847 (Bancroft 1886).

The cattle ranchers of the "counties" of southern California prospered during the cattle boom of the early 1850s. They were able to "reap windfall profit … pay taxes and lawyer's bills

… and generally live according to custom" (Pitt 1966). However, cattle ranching soon declined, contributing to the expansion of agriculture. With the passage of the "No Fence Act," San Diego's economy shifted from raising cattle to farming (Robinson 1948). The act allowed for the expansion of unfenced farms, which was crucial in an area where fencing material was practically unavailable. Five years after its passage, most of the arable lands in San Diego County had been patented as either ranchos or homesteads, and growing grain crops replaced raising cattle in many of the county's inland valleys (Blick 1976; Elliott 1883 [1965]).

By 1870, farmers had learned to dry farm and were coping with some of the peculiarities of San Diego County's climate (*San Diego Union* 1868; Van Dyke 1886). Between 1869 and 1871, the amount of cultivated acreage in the county rose from less than 5,000, to more than 20,000 acres (*San Diego Union* 1872). Of course, droughts continued to hinder the development of agriculture (Crouch 1915; *San Diego Union* 1870; Shipek 1977). Large-scale farming in San Diego County was limited by a lack of water and the small size of arable valleys. The small urban population and poor roads also restricted commercial crop growing. Meanwhile, cattle continued to be grazed in parts of inland San Diego County. In the Otay Mesa area, for example, the "No Fence Act" had little effect on cattle farmers because ranches were spaced far apart and natural ridges kept the cattle out of nearby growing crops (Gordinier 1966).

During the first two decades of the twentieth century, the population of San Diego County continued to grow. The population of the inland county declined during the 1890s, but between 1900 and 1910, it rose by about 70 percent. The pioneering efforts were over, the railroads had broken the relative isolation of southern California, and life in San Diego County had become similar to other communities throughout the west. After World War I, the history of San Diego County was primarily determined by the growth of San Diego Bay. In 1919, the United States Navy decided to make the bay the home base for the Pacific Fleet (Pourade 1967) and, in the 1920s, the bay became the home to the aircraft industry (Heiges 1976). The establishment of these industries led to the growth of the county as a whole; however, most of the civilian population growth occurred in the north county coastal areas, where the population almost tripled between 1920 and 1930. During this time period, the history of inland San Diego County was subsidiary to that of the city of San Diego, which had become a Navy center and an industrial city (Heiges 1976). In inland San Diego County, agriculture became specialized and recreational areas were established in the mountain and desert areas. Just before World War II, urbanization began to spread to the inland parts of the county.

General History of Ramona

The community of Ramona is located in the former Santa Maria Rancho land grant. Mexican soldier Narcisco Botello received the land grant to Santa Maria in 1833, and after abandoning the land, the property was regranted to Jose Joaquin Ortega and his son-in-law Edward Stokes in 1843 (San Diego County 2010). After the death of Ortega and Stokes, the latter's three sons, Adolfo, Eduardo, and Alfredo, inherited the ranch (Carrico and Flanigan 1991). Adolfo Stokes subsequently purchased his brothers' interest in the ranch and sold the majority of Santa

Maria Rancho to Juan Arrambide in 1872 (Carrico and Flanigan 1991). During the late nineteenth century, Arrambide and Bernard Echeverry, a French native under contact with Adolfo Stokes, raised sheep in the Santa Maria Valley (Carrico and Flanigan 1991).

In addition to the sheep industry, the area was used for grain production and served as a stopping point on the way to the mining town of Julian (Carrico and Flanigan 1991). Consequently, more individuals moved to the valley and eventually established a general store, a post office, and a stage station (Carrico and Flanigan 1991). In 1883, Amos Verlaque, invited to the area by Echeverry, built the Santa Maria Store and established the "Nuevo" post office (Carrico and Flanigan 1991). As a result, the community became known as Nuevo (San Diego History center 1990).

In 1886, civil engineer Milton Santee acquired over 3,800 acres from Bernard Echeverry and encouraged the development of an official town (Carrico and Flanigan 1991). Santee and a group of investors under the recently incorporated Santa Maria Land and Water Company purchased a large portion of present-day Ramona and divided the property into 40-acre parcels to sell (Carrico and Flanigan 1991). Desiring to promote the land, the community of Nuevo attempted to change the town's name to Ramona after the main character of Helen Hunt Jackson's popular novel (Carrico and Flanigan 1991). At first, the town was unable to acquire the name as the name was already in use by a post office in Los Angeles; however, after the closure of the Los Angeles post office, the community petitioned the Postmaster General for reuse of the name and the town was officially renamed Ramona in 1895 (Carrico and Flanigan 1991).

Over the next several decades, the community of Ramona continued to grow. According to Carrico and Flanigan (1991:15), "By 1900 there were about 166 families in the valley." As Ramona grew, the character of the community remained rural. During the twentieth century, Ramona become known as the "Turkey Capital of the World", and as turkey production declined, chicken production expanded in the region (San Diego History Center 1990; San Diego County 2010). By 2008, the community had grown to a population of approximately 35,000 people (San Diego County 2010).

1.3 Results of the Archaeological Records Search

BFSA reviewed the results of an archaeological records search conducted by the SCIC at SDSU within a one-mile radius of the project. The SCIC records search identified 67 historic addresses and 64 cultural resources (four prehistoric and 60 historic) within the one-mile radius of the project (Table 1.3–1). The prehistoric resources include one camp site, two bedrock milling feature sites, and one isolate. The historic resources consisted of one isolate, the Ramona Historic District, and 58 built resources. One cultural resource (P-37-029271) and one historic address were recorded within the subject property, both of which consist of the 915 Ninth Street single-family residence and barn located within APN 284-203-08.

Table 1.3–1
Cultural Resources Within One Mile of the
915 Ninth Street Project

Site(s)	Site Type	Site Dimensions (meters)	Report Reference / Reported By
SDI-13,179	Prehistoric campsite	135x120	Smith 1993
SDI-13,490	Prehistoric BMF	16x8	Hanna 1993
SDI-19,728		8.7x6.4	McGinnis 2009
P-37-040160	Prehistoric isolate	N/A	Wade 2021
SDI-12,042	Historic single-family property	N/A	Joyner and Maier 1990
SDI-12,044			
SDI-12,043	Historic school	N/A	
SDI-12,211	Historic single-family property	N/A	Joyner and Beck 1991
SDI-12,268	Ramona Historic District	N/A	Beck 1991
P-37-025439	Historic single-family property	N/A	Pierson 2004
P-37-029233	Historic single-family property	N/A	Carrico and Flanigan 1991
P-37-029234			
P-37-029238			
P-37-029239			
P-37-029240			
P-37-029241			
P-37-029242			
P-37-029243			
P-37-029244			
P-37-029245			
P-37-029246			
P-37-029247			
P-37-029248			
P-37-029249			
P-37-029251			
P-37-029252			
P-37-029253			
P-37-029254			
P-37-029255			
P-37-029256			
P-37-029258			
P-37-029260			
P-37-029261			
P-37-029262			
P-37-029264			
P-37-029267			

Site(s)	Site Type	Site Dimensions (meters)	Report Reference / Reported By
P-37-029269			
P-37-029271*			
P-37-029272			
P-37-029273			
P-37-029275			
P-37-029277			
P-37-029278			
P-37-029280			
P-37-029281			
P-37-029282			
P-37-029283			
P-37-029284			
P-37-029285			
P-37-029235	Historic commercial building	N/A	Carrico and Flanigan 1991
P-37-029236			
P-37-029237			
P-37-029259			
P-37-029268			
P-37-029250	Historic church	N/A	Carrico and Flanigan 1991
P-37-029257			
P-37-029265			
P-37-029266			
P-37-029270	Historic school	N/A	Carrico and Flanigan 1991
P-37-029274	Historic school and single-family residence	N/A	Carrico and Flanigan 1991
P-37-029276	Historic barn and single-family residence	N/A	Carrico and Flanigan 1991
P-37-029279	Historic single-family residence, foundation, and well	N/A	Carrico and Flanigan 1991; Wade and James 2022
SDI-19,727	Historic ranch	N/A	McGinnis 2009
P-37-033535	Historic isolate	N/A	Thomson 2013

**Resource recorded within project boundaries*

In total, 60 cultural resource studies have been conducted within a one-mile radius of the project, one of which overlaps the project (Carrico and Flanigan 1991). The Carrico and Flanigan (1991) study consists of the Ramona Historic Resources Inventory report conducted for the County of San Diego. Carrico and Flanigan (1991) recorded the 915 Ninth Street single-family property (P-37-029271) within the subject property and specifically noted the presence of a single-family residence and a barn constructed during the late nineteenth century. The property is associated with the Rural Architecture Context, which reflects a period of significance from 1870 to 1940

(Carrico and Flanigan 1991). Carrico and Flanigan (1991) provide the following history of the property:

> In 1899, George A. and Eva Telford purchased this property from the Santa Maria Land and Water Company. In 1900, Telford, a native of Missouri who came to Ramona in 1891, erected his two-story residence on this site. As a farmer, he grew grapefruit, Saville and Washington navel oranges, lemons, as well as prunes and peaches which he dried and sold to stores in San Diego. Telford also was an early contractor of Ramona and served as a master builder for the Congressional Church erected in 1907. In 1916, John and Sarah Kelly, who had lived across the street, purchased this residence. Kelly always said he wanted to live in this house before he died. After John Kelly's death in 1917, Sarah Kelly retained ownership until 1929 when the property was deeded to James F. and Frances D. Kelly. James Kelly, a rancher, Ramona judge from 1906 until 1949, and school board trustee, came to Ramona in 1903, at the age of 32. The Kellys retained ownership of this home until James Kelly's death in 1949 when the house was deeded to Clifford Fitzgerald and Marion Chalupnik, the daughter of James and Frances Kelly. Marion Chalupnik still resides at this address. The barn on the property predates the house and was erected in the 1890s.

The 915 Ninth Street single-family property is currently listed in the Office of Historic Preservation's (OHP) Built Environment Resource Directory (BERD) for the County of San Diego. The BERD indicates that the 915 Ninth Street property was identified during a survey but has not yet been evaluated for the National Register of Historic Places (NRHP) or the California Register of Historic Places (CRHR). Nevertheless, Carrico and Flanigan (1991) noted that the 915 Ninth Street single-family property is eligible for listing on the NRHP under criterion C for reflecting distinctive characteristics of Rural Architecture within the context's period of significance (1870 to 1940).

BFSA also reviewed the following historic sources:

- The NRHP Index
- The OHP, Archaeological Determinations of Eligibility
- The OHP, BERD
- The USGS 1955 and 1997 *Ramona, California* (7.5-minute) and USGS 1942 and 1947 *Ramona, California* (15-minute) topographic quadrangle maps
- Historic aerial photographs (1939 to 2025)

A review of historic aerial photographs indicates that the property has been impacted by clearing, discing, and residential use. The 915 Ninth Street single-family residence and barn (P-37-029271)

constructed during the late nineteenth century and recorded within APN 284-203-08 are first visible in the 1939 historic aerial photograph (Plate 1.3–1). The remainder of APN 284-203-08, in addition to APNs 284-202-21 and 284-244-01, consist of vacant fields. Subsequent historic aerial photographs demonstrate that the majority of the property continued to consist of vacant fields that were repeatedly cleared and disced during the twentieth and early twenty-first centuries. Additionally, several ancillary structures surrounding the 915 Ninth Street residence are clearly visible by the early twenty-first century. Currently, the 915 Ninth Street residence, barn, and ancillary structures are extant within the property. The remainder of the project primarily consists of recently disced fields.

1.4 Applicable Regulations

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in CEQA, the County of San Diego RPO, and the San Diego County Local Register provide guidance for making such a determination. The following sections detail the criteria that a resource must meet in order to be determined important.

1.4.1 California Environmental Quality Act

According to CEQA(§ 15064.5a), the term "historical resource" includes the following:

1) A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the CRHR (Public Resource Code [PRC] SS5024.1, Title 14 CCR. Section 4850 et seq.).
2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC SS5024.1, Title 14, Section 4852), including the following:



1939 Aerial Photograph



1953 Aerial Photograph



1975 Aerial Photograph



2003 Aerial Photograph

0 200 400 600 ft

0 60 120 180 m

Legend

Project boundary

BFSA Environmental Services

A Perennial Company

Plate 1.3–1

Historic Aerial Photographs

The 915 Ninth Street Project

a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
b) Is associated with the lives of persons important in our past;
c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
d) Has yielded, or may be likely to yield, information important in prehistory or history.

4) The fact that a resource is not listed in, or determined eligible for listing in, the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the PRC), or identified in a historical resources survey (meeting the criteria in Section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or 5024.1.

According to CEQA (§ 15064.5b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect upon the environment. CEQA defines a substantial adverse change as:

1) Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.
2) The significance of a historical resource is materially impaired when a project:

a) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or,
c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects upon archaeological sites and contains the following additional provisions regarding archaeological sites:

1. When a project will impact an archaeological site, a lead agency shall first determine whether the site is a historical resource, as defined in subsection (a).
2. If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.
3. If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC Section 21083.2(c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
4. If an archaeological resource is neither a unique archaeological nor historical resource, the effects of the project upon those resources shall not be considered a significant effect upon the environment. It shall be sufficient that both the resource and the effect upon it are noted in the Initial Study or Environmental Impact Report, if one is prepared to address impacts upon other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d-e) contains additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

(d) When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within the project, the lead agency shall work with the appropriate Native Americans as identified by the NAHC, as provided in PRC SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the NAHC. Action implementing such an agreement is exempt from:

    1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
    2) The requirements of CEQA and the Coastal Act.

1.4.2 San Diego County Local Register of Historical Resources

The County requires that resource importance be assessed not only at the state level as required by CEQA, but also at the local level. If a resource meets any one of the following criteria as outlined in the San Diego County Local Register, it will be considered an important resource:

1) Is associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage;
2) Is associated with the lives of persons important to the history of San Diego or its communities;
3) Embodies the distinctive characteristics of a type, period, San Diego County region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4) Has yielded, or may be likely to yield, information important in prehistory or history.

1.4.3 County of San Diego Resource Protection Ordinance

The County of San Diego's RPO protects significant cultural resources. The RPO defines "Significant Prehistoric or Historic Sites" as follows:

> Location of past intense human occupation where buried cultural deposits can provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, state, or federal importance. Such locations shall include, but not be limited to:
>
> 1) Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
>
>   a) Formally determined eligible or listed in the NRHP by the Keeper of the National Register; or
>   b) To which the Historic Resource ("H" Designator) Special Area Regulations have been applied; or
>
> 2) One-of-a-kind, locally unique, or regionally unique cultural resources, which contain a significant volume and range of data and materials; and
> 3) Any location of past or current sacred religious or ceremonial observances, which is either:
>
>   a) Protected under Public Law 95-341, the American Indian Religious Freedom Act, or PRC Section 5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground

figures; or

b) Other formally designated and recognized sites, which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

The RPO does not allow non-exempt activities or uses damaging to significant prehistoric or historic lands on properties under County of San Diego jurisdiction. The only exempt activity is scientific investigation authorized by the County. All discretionary projects are required to be in conformance with applicable County of San Diego standards related to cultural resources, including the noted RPO criteria for prehistoric and historic sites. Non-compliance would result in a project that is inconsistent with the County's standards.

2.0 GUIDELINES FOR DETERMINING SIGNIFICANCE

Pursuant to County of San Diego *Guidelines for Determining Significance, Cultural Resources: Archaeological and Historic Resources* (2006; Revised 2007), any of the following will be considered a significant impact to cultural resources:

1) The project, as designed, causes a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the State CEQA Guidelines.
2) The project, as designed, causes a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 of the State CEQA Guidelines.
3) The project, as designed, disturbs any human remains, including those interred outside of formal cemeteries.
4) The project proposes non-exempt activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the RPO.

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 and 15064.5 of the State CEQA Guidelines require evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect upon unique historical or archaeological resources. Guideline 3 is included because human remains must be treated with dignity and respect, and CEQA requires consultation with the "Most Likely Descendant" (MLD), as identified by the NAHC, for any project in which human remains have been identified. Guideline 4 was selected because the RPO requires that cultural resources be considered when assessing environmental impacts. Any project that would have an adverse impact (direct, indirect, or cumulative) upon significant cultural resources, as defined by Guideline 4, would be considered a significant impact. The only exemption is scientific investigation.

Although not a part of the current County Guidelines, CEQA requires that Tribal Cultural Resources also be considered. As such, the following guideline has been included:

5. The project proposes activities or uses that would impact tribal cultural resources as defined under PRC§ Section 21074.

This guideline has been included because tribal cultural resources are of cultural value to Native American tribes. Any project that would have an adverse impact (direct, indirect, and cumulative) on tribal cultural resources as defined by PRC§ Section 21074 would be considered a significant impact. Details of this regulation are provided below.

Traditional Cultural Properties

AB 52 became effective on July 1, 2015, requiring the evaluation of Tribal Cultural Resources (TCRs) under CEQA. The regulation requires that projects be evaluated for the presence of TCRs (including heritage value to tribes), and that appropriate mitigation be

implemented should TCRs be located within a project.

Native American Heritage Values

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. Consequently, an important element in assessing the significance of the project has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the proposed project.

Potentially relevant to prehistoric archaeological sites is the category termed Traditional Cultural Properties (TCPs) in discussions of cultural resource management performed under federal auspices. According to Parker and King (1998), "traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

The County of San Diego Guidelines identify TCPs as cultural resources, which may include gathering areas, landmarks, and ethnographic locations, in addition to archaeological districts (County of San Diego 2007). These guidelines incorporate both state and federal definitions of TCPs. Generally, a TCP may consist of a single site, a group of associated archaeological sites (districts; traditional cultural landscapes), or an area of cultural/ethnographic importance.

The Traditional Tribal Cultural Places Bill of 2004 requires local governments to consult with Native American representatives during the project planning process. The intent of this legislation is to encourage consultation and assist in the preservation of "Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance" (County of San Diego 2007). It further allows for tribal cultural places to be included in open space planning. AB 52, effective as of July 1, 2015, introduces the TCR as a class of cultural resource and emphasizes additional considerations for Native American consultation under CEQA. A TCR is conceptually similar to the federally defined TCP; however, it incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be considered significant if it: is included in a local or state register of historical resources, is determined by the lead agency to be significant pursuant to criteria set forth in PRC § 5024.1, is a geographically defined cultural landscape that meets one or more of these criteria, is a historical resource described in PRC § 21084.1, is a unique archaeological resource described in PRC§ 21083.2, or is a non-unique archaeological resource that adheres to the above criteria.

The National Park Service and Advisory Council for Historic Preservation introduced the term TCP in National Register Bulletin 38 (Parker and King 1998). A TCP may be considered eligible based upon "its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community" (Parker and King 1998:1). Strictly speaking, TCPs are both

tangible and intangible; they are anchored in space by cultural values related to community-based, physically defined "property referents" (Parker and King 1998:3). On the other hand, TCPs are largely ideological, a characteristic that may present substantial problems in the process of delineating specific boundaries. As such, a property's extent is based upon community conceptions of how the surrounding physical landscape interacts with existing cultural values. By nature, a TCP need only be important to the community and not the general outside population. Thus, a TCP boundary, as described in Bulletin 38, may be defined based upon viewscape, encompassing topographic features, the extent of an archaeological district or use area, or a community's sense of its geographic limits. Regardless of the reasons behind a TCP's importance to a group of people, outsider acceptance or rejection of this understanding is made irrelevant by the inherently relativistic nature of this concept.

3.0 ANALYSIS OF PROJECT EFFECTS

The cultural resources study for the project consisted of an institutional records search, an intensive cultural resource survey of the entire approximately 19.65-acre project, and the detailed recordation of all identified archaeological sites. The survey included APN 284-205-01, a remainder parcel from which density is being transferred; however, this parcel is not part of the tract map, and no development will be conducted there. This study was conducted in conformance with County of San Diego environmental guidelines, Section 21083.2 of the California PRC, and CEQA. Statutory requirements of CEQA (Section 15064.5) were followed for the identification of each cultural resource, in addition to the County of San Diego RPO. Specific definitions for archaeological resource type(s) used in this report are those established by the State Historic Preservation Office (SHPO 1995).

3.1 Methods

3.1.1 Survey Methods

The survey methodology employed during the current investigation followed standard archaeological field procedures and was sufficient to accomplish a thorough assessment of the project. The archaeological survey of the subject property took place on July 29, 2025. The intensive pedestrian survey was directed by Principal Investigator Tracy A. Stropes, M.A., RPA, and conducted by BFSA archaeologist John Baber. Native American monitor Gage Baay from Redtail was present for the cultural resources survey of the project. The entire project was accessible for the survey. A series of parallel survey transects, spaced at approximately 15-meter intervals, were employed to conduct the reconnaissance when not hindered by the present development. All potentially sensitive areas where cultural resources might be located were closely inspected. Photographs documenting survey discoveries and overall survey conditions were taken frequently.

3.1.2 Native American Participation

Gage Baay, a Kumeyaay Native American representative from Redtail, was present during the current survey of the project.

3.2 Results of the Field Survey

The survey methodology employed during the current investigation followed standard archaeological field procedures and was sufficient to accomplish a thorough assessment of the project. Most of the subject property has been recently cleared and disced, providing excellent ground surface visibility when not hindered by small pockets of vegetation. Visibility was limited at times by existing development within the northwest corner of APN 284-203-08 and by vegetation within APN 284-205-01 (Plates 3.2–1 to 3.2–4).



Plate 3.2–1: Overview of APN 284-202-21, facing east.



Plate 3.2–2: Overview from the northwest corner of APN 284-203-08, facing east.



Plate 3.2–3: Overview of APN 284-205-01, facing southwest.



Plate 3.2–4: Overview from the southwest corner of APN 284-244-01, facing north.

Vegetation within the property consists of maintained residential landscaping in the northeast corner of the project and non-native weeds, grasses, and pepper trees located throughout. Vegetation within APN 284-205-01 is denser, entirely consisting of Eucalyptus trees and non-native weeds and grasses. The remainder of the subject property has been recently cleared and disced, providing excellent ground visibility.

The survey resulted in the relocation of one historic resource (P-37-029271) and the identification of one prehistoric resource (Temp-1) and one historic isolate (Iso-1) (Figures 3.2–1 and 3.2–2). Site P-37-029271 consists of the previously recorded 915 Ninth Street residence and barn. In addition to the barn and residence, the survey identified four ancillary structures associated with the residence and barn: a water tank house, a pump house, a storage shed, and a woodshed. Site Temp-1 consists of a prehistoric bedrock milling feature identified within the southeast corner of APN 284-244-01. Iso-1 consists of a historic well head isolate located within the northeast corner of APN 284-202-21 (see Figures 3.2–1 and 3.2–2). Further descriptions of the resources are provided below.

3.2.1 Site P-37-029271 (915 Ninth Street)

Site P-37-029271 consists of the 915 Ninth Street single-family property recorded by Carrico and Flanigan (1991) during the Ramona Historic Resource Inventory study. The 915 Ninth Street single-family property is associated with the Telford and Kelly families, early residents of the community of Ramona (Carrico and Flanigan 1991). Site P-37-029271 is located within the northeast corner of APN 284-203-08. Carrico and Flanigan (1991) originally noted only the single-family residence and barn. However, in addition to the barn and residence, the present survey identified four ancillary structures including a water tank house, a pump house, a storage shed, and a woodshed associated with the 915 Ninth Street single-family property. According to the building record for APN 284-203-08, the 915 Ninth Street residence was constructed in 1888 and effective by 1890. Carrico and Flanigan (1991) note that the residence was constructed in 1900 by George Telford.

As designed, the 915 Ninth Street barn and four ancillary structures are slated to be demolished; the single-family residence will not be impacted by the proposed development. Nevertheless, as the removal of the barn and ancillary structures will indirectly impact the remaining single-family residence building, all historic age structures and features associated with the 915 Ninth Street property must be considered for potential effects. A historic structure evaluation for the 915 Ninth Street property (P-37-029271) is provided in Section 3.3.

3.2.2 Site Temp-1

Site Temp-1 consists of one bedrock milling feature located near the southeast corner of APN 284-244-01 (Plates 3.2–5 and 3.2–6 in Appendix E). The bedrock milling feature includes three milling slicks and one mortar (Table 3.2–1). The site measures approximately 3.3 by 3.3 meters. No prehistoric artifacts were located on the subject property.

Figure 3.2–1
Cultural Resource Location Map

(Deleted for Public Review; Bound Separately

Figure 3.2–2
Cultural Resources Shown on a Current Aerial Photograph

(Deleted for Public Review; Bound Separately)

Table 3.2–1
Bedrock Milling Feature Identified at Site Temp-1

BMF	BMF Dimensions (m)			Milling Element	Element Type	Element Dimensions (cm)		
	Length	Width	Height			Length	Width	Depth
A	1.8	1.8	0.46	1	Slick	26	24	-
				2	Slick	34	40	-
				3	Mortar	16	17	4
				4	Slick	26	28	-

The potential historical significance of Site Temp-1 has not been evaluated in accordance with CEQA criteria. Avoidance of the resource is not feasible as it would result in the loss of a residential unit within the proposed project design. Therefore, in order to determine if the proposed project constitutes a potential impact to historical resources, as defined by CEQA, the bedrock milling feature associated with Site Temp-1 must be evaluated to determine if it is significant.

3.2.3 Iso-1

Iso-1 consists of one historic well head located in the northeast corner of APN 284-202-21 (Plate 3.2–7 in Appendix E). The resource is located within a patch of non-native weeds and grasses. Based upon the attributes of the well head, the feature appears to be older than 50 years. However, there is no direct connection between the isolated water control feature and the historic 915 Ninth Street single-family property. Further, the well head does not possess any integrity. As an isolate, the well head is not eligible for the CRHR and not considered a Historical Resource as defined by CEQA. Nevertheless, the isolate has been recorded on the appropriate DPR forms.

3.3 Historic Resource Analysis

Within the boundaries of the subject property, previously recorded historic resource P-37-029271 was identified within the northeast corner of APN 284-203-08. Site P-37-029271 was recorded by Carrico and Flanigan (1991) during the Ramona Historic Resource Inventory survey as a historic single-family property consisting of a residence and a barn. Carrico and Flanigan (1991) determined that the 915 Ninth Street property was eligible for listing on the CRHR under Criterion 3. However, the eligibility assessment and inventory did not include the water tank house, pump house, storage shed, and woodshed associated with the property that were identified during the current study (see Section 3.2). As such, Site P-37-029271 consists of a single-family residence, a barn, a water tank house, a pump house, a storage shed, and a woodshed associated with the address 915 Ninth Street.

Research conducted by Carrico and Flanigan (1991) indicated that the 915 Ninth Street property was historically known as the Telford Residence and was constructed in 1900 by George A. Telford. Additionally, Carrico and Flanigan (1991) note that the barn was constructed prior to

the residence in the 1890s. According to the building record, the construction year for the residence was 1888 and the effective year was 1900. The building record also indicates that the barn was constructed in 1890, the water tank house was constructed circa 1900, the storage shed and woodshed were constructed circa 1935, and the pump house was constructed circa 1950.

The following section provides the pertinent field results for the significance evaluation for the historic resource located within the project. An evaluation is required as the barn will be removed by the proposed project resulting in impacts to the 915 Ninth Street property. A brief history of the project is provided below in Section 3.3.1, followed by the architectural descriptions and significance evaluations of the historic buildings in Sections 3.3.2 and 3.3.3.

3.3.1 History of the 915 Ninth Street Property (P-37-029271)

The history of the 915 Ninth Street property is presented in the Ramona Historic Resources Inventory which resulted in the initial recordation of P-37-029271 (Carrico and Flanigan 1991):

> In 1899, George A. and Eva Telford purchased this property from the Santa Maria Land and Water Company. In 1900, Telford, a native of Missouri who came to Ramona in 1891, erected his two-story residence on this site. As a farmer, he grew grapefruit, Saville and Washington navel oranges, lemons, as well as prunes and peaches which he dried and sold to stores in San Diego. Telford also was an early contractor of Ramona and served as a master builder for the Congressional Church erected in 1907. In 1916, John and Sarah Kelly, who had lived across the street, purchased this residence. Kelly always said he wanted to live in this house before he died. After John Kelly's death in 1917, Sarah Kelly retained ownership until 1929 when the property was deeded to James F. and Frances D. Kelly. James Kelly, a rancher, Ramona judge from 1906 until 1949, and school board trustee, came to Ramona in 1903, at the age of 32. The Kellys retained ownership of this home until James Kelly's death in 1949 when the house was deeded to Clifford Fitzgerald and Marion Chalupnik, the daughter of James and Frances Kelly. Marion Chalupnik still resides at this address. The barn on the property predates the house and was erected in the 1890s.

The architect and builder of the 915 Ninth Street single-family residence was George Telford (Carrico and Flanigan 1990). The 1900 census indicates that Telford was born in 1853 in New York (Ancestry.com 2004). In 1876, Telford married Eva J. Butler in Meadville, Linn County, Missouri (Ancestry.com 2007). Eva Butler was born circa 1854 in New York to Susannah and Seth Butler (Ancestry.com 2006b). Census records indicate that the Butler family lived in Wisconsin in 1860 and had moved to Linn, Missouri by 1870 (Ancestry.com 2009a, 2009b). Following their marriage in 1876, Eva and George Telford continued to reside in Missouri until the 1890s (Ancestry.com 2004). The San Diego County directories demonstrate that the Telford family moved to Nuevo, or present-day Ramona, by 1892 where George Telford worked as a

farmer (Ancestry.com 2011a).

The Telford family continued to live in Ramona until the first half of the twentieth century and were considered pioneers of the Ramona region (*Ramona Sentinel* 1933). Together, George and Eva Telford had two children, Clarence and Caroline Telford (Ancestry.com 2005). The 1910 census (Ancestry.com 2006a) notes that the Telford family lived on Main Street in Ramona and the 1930 census indicates that the family lived on 6th Street in Ramona (Ancestry.com 2002). During this period, George Telford worked as a farmer, a carpenter, and a lumber yard salesman before retiring by the 1930s (Ancestry.com 2002). Eva Telford passed away in Ramona in 1933, and George Telford passed away in 1934 in Ramona (*Ramona Sentinel* 1933; Ancestry.com 2013).

According to Carrico and Flanigan (1991), John and Sarah Kelly purchased the 915 Ninth Street residence in 1916 from the Telford family. John Kelly was born in 1841 in Salem, Warren County, Ohio to William and Nancy Kelly (Ancestry.com 2011b). In 1869, Kelly married Sarah E. Hicks of Warren County, Ohio, the daughter of James Hicks and Malinda Varner (Ancestry.com 2001). In 1871, John and Sarah Kelly had a son, James Franklin Kelly (Ancestry.com 2011b). Sarah Kelly passed away in Ohio in 1891 leaving her husband and her son (Ancestry.com 2020). Several years afterward, James Kelly married Pearl Athey in 1895 in Warren County, Ohio (Ancestry.com 2001). Pearl Athey was born in 1876 in Clinton County, Ohio to Alpheaus Athey and Sarah Adair (Ancestry.com 2011b). Together, the couple had four children, Miriam, John, Marion, and George Kelly (Ancestry.com 2011b).

In 1890, the *Ramona Sentinel* (1890) posted a notice that James Kelly was homesteading land in Ramona. However, the 1900 census indicates that James and Pearl Kelly still resided in Ohio where James worked as a farmer (Ancestry.com 2004). The father of James Kelly, John, also resided with them at that time. According to the Ramona Historic Resources Inventory study (Carrico and Flanigan 1991):

> The Nuevo Township Court, after operating 12 years, became known as the Santa Maria Township court in 1902. Later that same year, the name changed to Ramona Court. James F. Kelly, Ramona's longest serving judge, came to the town from Ohio in 1903 for his health. His length of tenure was from 1906 to 1949.

The 1910 census demonstrates that by this time, James and Pearl Kelly were living in Ramona on Woolman Avenue (Ancestry.com 2006a). The 1920 census (Ancestry.com 2010) notes that James Kelly owned a farm, and the 1930 census (Ancestry.com 2002) indicates that Kelly worked as a Justice of Peace. By 1910, John Kelly had also moved to Ramona, California (Ancestry.com 2011a). In 1904, John Kelly was remarried to Sarah Adair, the mother of his daughter-in-law Pearl Athey Kelly (Ancestry.com 2014a). Together, John and Sarah Kelly lived in Ramona until their respective deaths in 1917 and 1944 (Ancestry.com 2013, 2000). After the death of her husband, Sarah Kelly, the mother of Pearl Kelly and the mother-in-law of James Kelly, lived with her children in Ramona (Ancestry.com 2011a).

Pearl Kelly passed away in 1928 in Ramona (Ancestry.com 2013). Her husband James Kelly passed away approximately two decades later in 1949 in Ramona (Ancestry.com 2000). Carrico and Flanigan (1991) indicate that after the passing of her father, Marion Kelly inherited the 915 Ninth Street property (Plate 3.3–1). Marion Sarah Kelly was born in 1915 in Ramona, California (Ancestry.com 2005). Although Carrico and Flanigan (1990) note that Kelly's mother was Frances D. Kelly, the California Birth Index and census records suggest that Marion Kelly's mother was Pearl Athey Kelly (Ancestry.com 2005, 2010). In 1937, Kelly married Charles Warren Ramsay in Yuma, Arizona (Ancestry.com 2016). By 1940, the couple resided on Linda Vista Road in Ramona, California where Marion worked as a telephone operator (Ancestry.com 2012; Legacy.com 2007). Marion and Charles Warren separated during the 1940s, and in 1949 Marion remarried Victor Chalupnik in Reno, Nevada (Ancestry.com 2014b). Together, Marion and Victor Chalupnik had two sons, Victor James and Randall Jospeh Chalupnik.

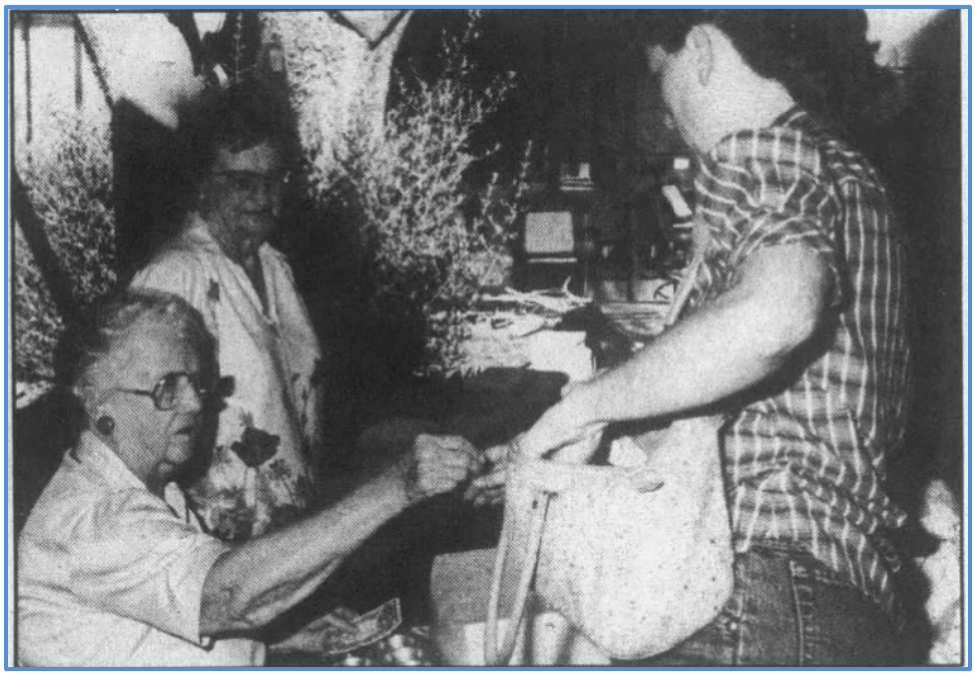


Plate 3.3–1: Marion Chalupnik (bottom left), a volunteer of the Ramona Pioneer Historical Society. (Courtesy of the Ramona Sentinel 1990)

The Chalupnik family resided at 915 Ninth Street in Romona from 1950 until the 1990s (Ancestry.com 2011a; *Daily Times-Advocate* 1980). Victor Chalupnik passed away in 1980 (*Daily Times-Advocate* 1980). After the death of her husband, Marion Chalupnik continued to reside at 915 Ninth Street until her later years when she moved to Brawley, California to be closer to her sons and their families (Legacy.com 2007). Marion Chalupnik passed away in 2007 in Brawley, California (Legacy.com 2007). At the time Site P-37-029271 was recorded in 1991, Marion Chalupnik was still residing at the 915 Ninth Street property (Carrico and Flanigan 1991).

3.3.2 Description of Surveyed Resources

The 915 Ninth Street single-family property consists of a single-family residence, a barn, a water tank house, a pump house, a storage shed, and a woodshed. The 915 Ninth Street residence was constructed in 1900 by George A. Telford. Carrico and Flanigan (1991) indicated that "the barn on the property predates the house and was erected in the 1890s." This corresponds with the building record, which notes that the barn was constructed in 1890 and effective by 1935. The building record also indicates the construction years for the ancillary structures located within the property: the water tank house was constructed circa 1900, the storage shed and woodshed were constructed circa 1935, and the pump house was constructed circa 1950.

Single-family residence

The survey determined that the 915 Ninth Street single-family residence is still in its original location within the northeast corner of APN 284-203-08. At the time of recordation, Carrico and Flanigan (1991) described the building as follows:

> This yellow Victorian house with white trim is two stories and front gabled with wings and additions. Wood siding is tongue-and-groove and entrance is through enclosed porch to side of house. Brick chimney is ivy-covered. There is a half-circle window in the front gable of the house and the eaves are overhanging and enclosed. Windows are double hung. The additions have a shed-style roof.

The residence is a Victorian building constructed in the Queen Anne style. The building features an irregular-shaped footprint with a carport addition extending westward from the northern half of the building's west elevation. It appears that the building originally exhibited an irregular-shaped footprint. The principal mass of the building features a two-storied T-shaped footprint with north, east, and west wings. Along the east façade, a single-story, eastern-facing cross gable extends several feet beyond the principal mass of the building. The original portions of the building feature a cross-gabled roof. Since the residence was built, three separate additions have been constructed. Along the west façade of the north wing, a west addition was constructed at an unknown date and features a shed roof. A second addition was constructed along the west addition at an unknown date to form a carport. Within the northeast corner of the residence, a third addition was constructed by enclosing the building's front porch between 1991 and 2012. All three additions do not extend above the primary story. At present, the building measures approximately 55x48 feet.

The building record indicates that the residence was constructed on a concrete foundation with a standard frame and a gable roof comprised of composite shingles. The original fenestration features double hung and casement windows with screens. Further, the exterior was originally clad in wooden siding. The survey confirmed that the residence is presently clad in a tongue-and-groove exterior. Since the resource was recorded in 1991, the building has been repainted light blue. Although much of the original fenestration remains, several single-sliding aluminum-framed

were introduced between 1991 and the present as a result of enclosing the northeast front porch. Additionally, the composite shingles on the roof have been replaced since the building's initial construction. The building also features enclosed eaves with a moderate overhang.

The primary (north) façade of the single-family residence faces Ninth Street and is front gabled (Plate 3.3–2 and 3.3–3). The eastern third of the north façade includes the eastern addition with a shed roof extending from the original footprint. Formerly, the northeast corner of the building featured an open front porch that was enclosed between 1991 and 2012 (Plate 3.3–4). As a result, the eastern half of the north façade includes two unoriginal aluminum-framed, single-sliding windows and a wood door with an aluminum-framed, single-hung window. The central third of the north façade features a primary story and an upper story. The primary story contains one wood-trimmed, wood-framed double-hung window and a wood-trimmed, wood-framed casement window. The upper story exhibits one wood-trimmed double-hung window with the original wood-framed screen. At the gable end, there is a half-circle attic window with wood trim. The western third of the north façade features the west addition and carport addition with their shed roofs. The north façade of the west addition features one wood-trimmed, double-hung window.

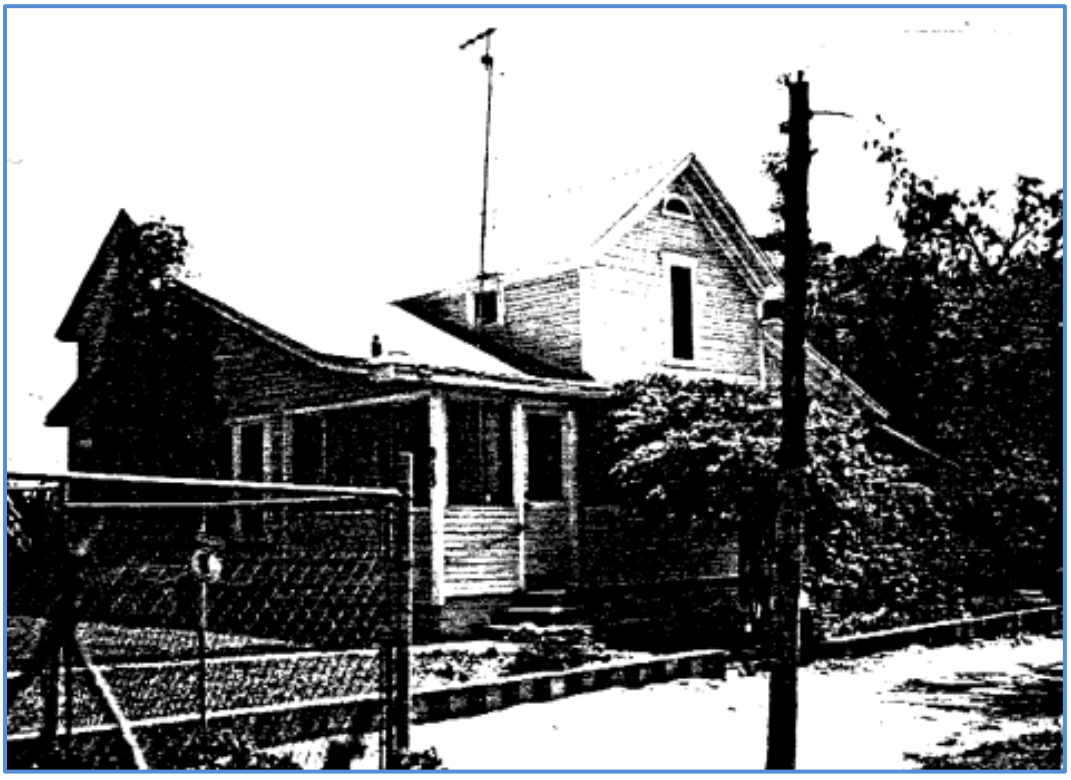


Plate 3.3–4: View of the north and east façades of the 915 Ninth Street single-family residence in 1991.
(Courtesy of Carrico and Flanigan 1991)



BFSA Environmental Services
A Perennial Company

Plate 3.3–2

Overview of the Eastern Half of the North Façade of the 915 Ninth Street Single-Family Residence, Facing South

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–3

Overview of the Eastern Half of the North Façade of the 915 Ninth Street Single-Family Residence, Facing Southeast

915 Ninth Street

The west façade of the residence features the carport, the western addition, and the original west wing (Plates 3.3–5 to 3.3–7). The carport was constructed along the western addition and extends approximately 17 feet from the remainder of the building. The carport features a shed roof supported by metal beams attached to wooden fencing. Underneath the carport, concrete steps provide access to the back entrance which consists of a wooden door set behind a wooden screen door. Wooden beams extend from the roof of the carport and attach to the top steps. A wood-trimmed, wood-framed double-hung window with a wood-framed screen is present to the north of the back entry way and is also sheltered underneath the carport. The west façade of the original west wing of the residence features one wood-trimmed, wood-framed double-hung window with a wood-framed screen in the primary story and a wood-trimmed, wood-framed double-hung window in the second story. Additionally, the gable end of the west wing features one half-circle attic window. From the west side of the residence, a small wood-trimmed window is visible within the north façade of the west wing.

The south façade of the residence features two distinct portions, the southernmost end of the principal mass of the building and the south façade of the eastern facing cross-gable (Plate 3.3–8). The south façade of the principal mass of the building features two sets of two mulled wood-framed, double-hung windows within the primary story and three identical, evenly spaced wood-framed, double-hung windows in the upper story. One set of mulled windows in the primary story and one window in the upper story still retain their wood-framed screens. The south façade of the gable end features one large wood-framed, six-paned picture window.

The east façade of the residence features the east wing, the one-story east gable end, and a portion of the former front porch that was enclosed between 1991 and 2012 (Plates 3.3–9 and 3.3–10). The primary story east façade of the original east wing includes two wood-trimmed, wood-framed double-hung windows mulled to one another, both of which retain their wood-framed screens. The upper story features a single wood-trimmed, wood-framed double-hung window and a half-circle attic window at the gable end. The east façade of the one-story gable end features a centrally located brick chimney, and two sets of two mulled wood-framed, double-hung windows present on either side of the chimney. Of the four double-hung windows, only three retain their original wood-framed screen. Underneath the northern set of windows, a covered window box extends from the remainder of the façade. The east façade of the northeast addition to the building, or the portion of the residence that was formerly an open porch and which has since been enclosed, features an unoriginal aluminum-framed fixed window mulled on both sides to single-sliding windows. Wood trim surrounds the window and outlines the former porch openings.



BFSA Environmental Services
A Perennial Company

Plate 3.3–5

Overview of the East Façade of the 915 Ninth Street Single-Family Residence, Facing East

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–6

Overview of the East Façade of the 915 Ninth Street Single-Family Residence, Facing Southwest

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–7

Close View of the Back Entrance to the 915 Ninth Street Single-Family Residence, Facing Southwest

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–8

Overview of the South Façade of the 915 Ninth Street Single-Family Residence, Facing Northwest

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–9

Overview of the Southern Half of the East Façade of the 915 Ninth Street Single-Family Residence, Facing West

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–10

Overview of the Northern Half of the East Façade of the 915 Ninth Street Single-Family Residence, Facing Southwest

915 Ninth Street

Barn

According to the building record, the barn was originally built with a rectangular-shaped footprint measuring approximately 48x56 feet and featured a gable roof made of corrugated aluminum, a concrete foundation, and a board-and-batten exterior. The survey determined that the 915 Ninth Street barn is situated within its original location of the property and retains a board-and-batten wood exterior, a rectangular footprint, and a gable roof (Plates 3.2–11 to 3.3–14). However, the barn is currently in very poor condition. The northern two-thirds of the barn have caved in resulting in a loss of original materials and design. Additionally, two types of corrugated metal sheets are present on the roof, suggesting that portions of the original roofing have been replaced.

Ancillary Structures

Four additional structures were identified during the survey that are associated with the 915 Ninth Street single-family property. This includes a water tank house, a storage shed, a woodshed, and a pump house. According to the building record, the water tank house was constructed circa 1900, the storage shed and woodshed were constructed circa 1935, and the pump house was constructed circa 1950.

The water tank house features a square-shaped footprint and measures approximately 10x10 feet (Plates 3.2–15 to 3.3–18). The structure is approximately 20 feet tall, and the upper portion of the building exhibits a mansard style construction comprised of composite shingles topped by a hipped roof made of composite shingles and featuring a closed eave overhang. The remainder of the exterior is clad in horizontal wood siding, and the entire structure is painted red. The east façade of the structure features the primary entrance, which consists of a wooden door attached to the building with metal hinges. The north façade features two centrally located window openings and a wooden trim outlining the location of the windows. The west façade of the water tank house features three window openings, one in the upper portion and two in the lower portion. It also appears that the structure extended further west as portions of wood panels are still attached to the west façade of the building and which expose an unpainted portion of the structure behind them. The south façade also features two window openings. Two six-paned, red-painted, wood-framed windows are resting alongside the building and possibly reflect two of the windows that were formerly featured.

The pump house exhibits a rectangular-shaped footprint and measures approximately 5x6 feet (Plate 3.2–19). It is located directly southwest of the water tank house. The structure consists of a wood frame with a chicken wire exterior set upon a concrete foundation. The shed roof is made of a corrugated metal sheet with wooden supports that outline a portion of the top of the roof.

The storage shed features a rectangular footprint and measures approximately 30x12 feet (Plates 3.2–20 to 3.3–24). The storage shed is located southwest of the water tank house and pump house. The structure features a gable roof made of corrugated metal with exposed, overhanging eaves. The exterior of the storage shed is painted red and is clad in board-and-batten wood siding and horizontal tongue-and-groove siding within the gable ends.



BFSA Environmental Services
A Perennial Company

Plate 3.3–11

East Façade of the 915 Ninth Street Barn (P-37-029271), Facing West

915 Ninth Street



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Plate 3.3–12

North Façade of the 915 Ninth Street Barn (P-37-029271), Facing South

915 Ninth Street



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Plate 3.3–13

South façade of the 915 Ninth Street Barn (P-37-029271), Facing North

915 Ninth Street



BFSA Environmental Services
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Plate 3.3–14

West Façade of the 915 Ninth Street Barn (P-37-029271), Facing East

915 Ninth Street



BFSA Environmental Services
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Plate 3.3–15

East Façade of the 915 Ninth Street Water Tank House (P-37-029271), Facing West

915 Ninth Street



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Plate 3.3–16

South Façade of the 915 Ninth Street Water Tank House (P-37-029271), Facing Northwest

915 Ninth Street



BFSA Environmental Services
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Plate 3.3–17

West Façade of the 915 Ninth Street Water Tank House (P-37-029271), Facing Northeast

915 Ninth Street



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Plate 3.3–18

North Façade of the 915 Ninth Street Water Tank House (P-37-029271), Facing East

915 Ninth Street



BFSA Environmental Services
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Plate 3.3–19

Overview of the 915 Ninth Street Pump House and Well Head (P-37-029271), Facing Northeast

915 Ninth Street



BFSA Environmental Services
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Plate 3.3–20

North Façade of the 915 Ninth Street Storage Shed (P-37-029271), Facing South

915 Ninth Street



BFSA Environmental Services
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Plate 3.3–21

Addition to the North Façade of the 915 Ninth Street Storage Shed (P-37-029271), Facing South

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–22

West Façade of the 915 Ninth Street Storage Shed (P-37-029271), Facing North

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–23

South Façade of the 915 Ninth Street Storage Shed (P-37-029271), Facing Northwest

915 Ninth Street



BFSA Environmental Services
A Perennial Company

Plate 3.3–24

East Façade of the 915 Ninth Street Storage Shed (P-37-029271), Facing West

915 Ninth Street

The north facade of the storage shed features the primary entrance, which consists of a wooden door attached to the building via metal hinges, and the gable end, which includes one louvered attic window. Along the eastern half of the north façade, a non-enclosed, wooden addition was constructed at an unknown date which features a shed roof made of corrugated metal and two small, fixed-framed windows at the addition's northern end. The addition appears to serve as additional storage space.

The west façade of the storage shed includes the wooden panels of the north addition and the original portion of the building. The original west façade features the board-and-batten exterior and two bump-out window spaces, each of which originally contained two wood-framed, six-paned windows mulled to one another. At present, each bump-out contains only one window, both of which have fallen inwards.

The east façade of the building exhibits one wood-framed, six-paned hopper window. The south façade of the storage shed features three bump-out windows with two six-paned, wood-framed windows, one of which retains a portion of the original wood-framed screen. The third bump out window retains only the wood-framed screen. Further, a corrugated metal overhang separating the horizontal siding of the upper gable end and the board-and-batten exterior extends several feet from the remainder of the façade.

The woodshed is located northwest of the storage shed and southeast of the barn (Plate 3.3–25). The woodshed is rectangular-shaped and measures approximately 10x16 feet. The structure features a shed roof made of corrugated metal and a horizontal clapboard siding exterior. The north façade features the primary entrance, which consists of a wide opening. Some of the wood siding has been removed or fallen off from the west and south façades of the woodshed.

3.3.3 Significance Evaluations

CEQA guidelines (Section 15064.5) address archaeological and historic resources, noting that physical changes that would demolish or materially alter in an adverse manner those characteristics that convey the historic significance of the resource and justify its listing on inventories of historic resources are typically considered significant impacts. Because demolition of the historic barn and ancillary structures would require approval from the County of San Diego as part of the proposed project, CEQA eligibility criteria were used to evaluate the 915 Ninth Street buildings as potentially significant historic property. Therefore, criteria for listing on the CRHR were used to measure the significance of the resources. The configuration of the structures within Site P-37-029271 is provided in Figure 3.3–1.

Integrity Evaluations

When evaluating a historic resource, integrity is the authenticity of the resource's physical identity clearly indicated by the retention of characteristics that existed during its period of significance. It is important to note that integrity is not the same as condition. Integrity directly relates to the presence or absence of historic materials and character-defining features, while condition relates to the relative state of physical deterioration of the resource.

Figure 3.3–1
Historic Structure Location Map

(Deleted for Public Review; Bound Separately)



BFSA Environmental Services
A Perennial Company

Plate 3.3–25

Overview of the 915 Ninth Street Woodshed (P-37-029271), Facing Southeast

915 Ninth Street

In most instances, integrity is more relevant to the significance of a resource than condition; however, if a resource is in such poor condition that original materials and features may no longer be salvageable, then the resource's integrity may be adversely impacted.

The County of San Diego does not currently have guidelines for identifying and evaluating specific types of architecture, so definitions provided in *A Field Guide to American Houses (Revised): The Definitive Guide to Identifying and Understanding America's Domestic Architecture* by McAlester (2015) were used to identify the building's architectural styles. In order to determine whether or not the 915 Ninth Street property is eligible for listing, CRHR, NRHR, and County of San Diego eligibility criteria were used. Furthermore, BFSA based the review upon the recommended criteria listed in the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Andrus and Shrimpton 2002). This review is based upon the evaluation of integrity of the building followed by the assessment of distinctive characteristics. For the 915 Ninth Street property, the seven aspects of integrity were used for the evaluation, as recommended in the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Andrus and Shrimpton 2002):

1. **Integrity of Location** *[refers to] the place where the historic property was constructed or the place where the historic event occurred* (Andrus and Shrimpton 2002). Integrity of location was assessed by reviewing historical records and aerial photographs in order to determine if the buildings had always existed at their present locations or if they had been moved, rebuilt, or their footprints significantly altered. Historical research revealed that the 915 Ninth Street residence and ancillary structures located within the project were constructed in their current locations. Therefore, the 915 Ninth Street residence, barn, and ancillary structures retain integrity of location.

2. **Integrity of Design** *[refers to] the combination of elements that create the form, plan, space, structure, and style of a property* (Andrus and Shrimpton 2002). Integrity of design was assessed by evaluating the spatial arrangement of the buildings and any architectural features present. The 915 Ninth Street residence was constructed during the late 1890s and embodies characteristic design features representing the Queen Anne style of the Victorian period of construction. For example, it exhibits a characteristic steep-pitch roof with a dominant front-facing gable. However, the residence's original partial front porch was enclosed between 1991 and 2012 to form an east addition. Additionally, two west additions have expanded the original footprint and have added an unoriginal shed roof style in addition to the original cross-gable roof design. The enclosure of the porch and construction of the east addition have also resulted in the addition of a non-original door and three non-original aluminum-framed windows that contrast from the original wood-framed double-hung and casement windows. The non-original materials have significantly altered the appearance of the residence and do not reflect the period of construction or original workmanship. Therefore, the 915 Ninth

Street residence does not retain integrity of design.

Alterations have also affected the original design of the barn and storage shed. The barn is currently in very poor condition and is falling apart, which has obscured the ability to see the original design, and which has resulted in the removal of many of the original materials that formed the north, west, and east façades of the structure. Additionally, the north addition to the storage shed has altered the original spatial arrangement of the structure. As such, the storage shed and barn no longer retain integrity of design.

The remaining ancillary structures within the property, which include the pump house, storage shed, and woodshed, do not appear to have been altered in form, plan, space, structure, or style since their original construction and therefore retain their integrity of design. However, as the residence, barn, and storage shed no longer retain integrity of design, the 915 Ninth Street property collectively no longer retains integrity of design.

3. **Integrity of Setting** *[refers to] the physical environment of a historic property. Setting includes elements such as topographic features, open space, viewshed, landscape, vegetation, and artificial features* (Andrus and Shrimpton 2002). Integrity of setting was assessed by inspecting the elements of the property, which include topographic features, open space, views, landscape, vegetation, man-made features, and relationships between buildings and other features. While historic aerial photographs demonstrate that additional houses have been constructed to the north of the property during the twentieth and twenty-first centuries, the area surrounding the subject property has remained rural residential. Therefore, despite alterations to the residence, barn, and shed, the property retains its historic character and spatial relationship of open space, viewshed, landscape, vegetation, and general built environment from the historic period. Therefore, the 915 Ninth Street property retains integrity of setting.

4. **Integrity of Materials** *[refers to] the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property* (Andrus and Shrimpton 2002). Integrity of materials was assessed by determining the presence or absence of original building materials, as well as the possible introduction of materials that may have altered the architectural design of the buildings. Since its original construction, significant alterations, modifications, and material replacements have occurred to the 915 Ninth Street single-family residence. The alterations to the residence include the introduction of non-original exterior siding, windows, door, and roofing materials, as well as the construction of non-original addition to the west, east, and north elevations.

A large portion of the 915 Ninth Street barn has fallen apart, which has obscured the ability to see the original design of the structure. This has resulted in the removal of many of the original materials that formed the north, west, and east façades of the structure. Further, it makes it difficult to gauge the extent to which the original materials of the structure are missing.

Materials have also been introduced to the storage shed with the construction of the north addition, which has affected the structure's integrity of materials. Further, two of the original windows of the storage shed are missing. Likewise, the original windows of the well house have also been removed.

Therefore, the residence, barn, well house, and storage shed no longer retain integrity of materials. Although the integrity of materials for the pump house and woodshed remains, the 915 Ninth Street property no longer retains integrity of materials due to the alterations to the residence, barn, storage shed, and well house.

5. **Integrity of Workmanship** *[refers to] the physical evidence of the labor and skill of a particular culture or people during any given period in history* (Andrus and Shrimpton 2002). The 915 Ninth Street residence was constructed in the late 1890s by George A. Telford (Carrico and Flanigan 1990). Integrity of workmanship was assessed by evaluating the quality of the architectural features present in the buildings. The original workmanship demonstrated by the construction of the 915 Ninth Street residence, barn, and ancillary structures appears to have been average. The non-original alterations to the residence represent the same level of workmanship, and the extensive modifications have slightly impacted the initial workmanship the building once portrayed. Additionally, the addition of the aluminum-framed windows in contrast to the original wood-framed double-hung and casement windows on the 915 Ninth Street residences obscures the character of the building's original construction. These changes to the design diminish the property's demonstration of skilled historic labor. The barn and ancillary structures were constructed by unknown builders and do not possess high artistic value. Therefore, the 915 Ninth Street property does not retain integrity of workmanship.

6. **Integrity of Feeling** *[refers to] a property's expression of the aesthetic or historic sense of a particular period of time* (Andrus and Shrimpton 2002). Integrity of feeling was assessed by evaluating whether or not the resources' features, in combination with their setting, conveyed a historic sense of the property during their period(s) of construction. As noted previously, the integrity of setting for the property overall remains intact as rural residential.

Alterations to the 915 Ninth Street residence have impacted the original footprint, materials, and design of the building. However, the residence, in addition to the water tank house, storage shed, woodshed, and pump house, continue to reflect early rural architectural styles. Further, the overall setting of the building and structures remains consistent. As such, the residence, water tank house, storage shed, woodshed, and pump house retain integrity of feeling.

The condition of the barn has resulted in a loss of design and materials that has impacted the barn's integrity of feeling as the structure no longer represents the historic sense of the property at the time it was constructed. Therefore, the barn no longer retains integrity of feeling.

7. **Integrity of Association** *[refers to] the direct link between an important historic event or person and a historic property* (Andrus and Shrimpton 2002). Integrity of association was assessed by evaluating the resources' data or information and their ability to answer any research questions relevant to the history of Ramona or the state of California. The 915 Ninth Street residence was constructed in the late 1890s by George A. Telford after migrating to Ramona from Missouri with his family. The Telford family lived at 915 Ninth Street until 1916 when the property was purchased by John and Sara Kelly, the father and mother-in-law of Ramona's longest standing judge and another Ramona pioneer, James Francis Kelly. Although historic records do not indicate that Judge James Kelly resided at the 915 Ninth Street property, his daughter Marion Chalupnik continuously lived at the property from the 1950s to the 1990s. Based upon a review of available historic records, census data, and newspaper articles, two pioneer Ramona families owned and lived at the property, the Telford and Kelly families. While the resources contained within the project represents early Romona settlement, the association of the Telford and Kelly families embodied in their construction are not indicative of outstanding significance to local or regional history. Therefore, the 915 Ninth Street property does not retain integrity of association.

The entire 915 Ninth Street property was determined to retain integrity of location and setting. The 915 Ninth Street residence, water tank house, pump house, storage shed, and woodshed also retain integrity of feeling. However, the barn does not retain integrity of feeling. Due to extensive non-original modifications broadly impacting the representation of the historic period of construction, the overall property does not retain integrity of materials, design, workmanship, or association.

CRHR Evaluation

For a historic resource to be eligible for listing on the CRHR, the resource must be found significant at the local, state, or national level, under one or more of the following criteria:

- **CRHR Criterion 1:**
  It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

  It was discovered through historical research that no significant events could be associated with the 915 Ninth Street property. Because the residence, barn, and ancillary structures could not be associated with any specific historic event(s), they are not eligible for designation under CRHR Criterion 1.

- **CRHR Criterion 2:**
  It is associated with the lives of persons important in our past.

  Historical research revealed that the 915 Ninth Street property could not be associated with any persons important in our past. Although two families (Telford and Kelly) considered pioneers to the Ramona region can be associated with the property, the individuals who lived at the property are not significant contributors to the history of Ramona. Therefore, the residence, barn, and ancillary structures are not eligible for designation under CRHR Criterion 2.

- **CRHR Criterion 3:**
  It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.

  In the Ramona Historic Resources Inventory study, Carrico and Flanigan (1991) determined that the 915 Ninth Street single-family property, which only identified the barn and single-family residence, was eligible for listing on the CRHR under Criterion 3. The 915 Ninth Street single-family residence is a Victorian building constructed in the Queen Anne style in the 1890s by George A. Telford (Carrico and Flanigan 1991). The period of significance for Queen Anne style buildings is from 1880 to 1910. The character-defining features for the Queen Anne style are defined by McAlester (2015:345) as follows:

  > Steeply pitched roof of irregular shape, usually with a dominant front-facing gable; patterned shingles, cutaway bay windows, and other devices used to avoid a smooth-walled appearance; asymmetrical façade

> with partial or full-width porch which is usually one story high and extended along one or both side walls.

Of the character-defining features of the Queen Anne style, the 915 Ninth Street residence reflects a steeply pitched roof with a dominant front-facing gable. Originally, the building featured a partial porch; however, between 1991 and 2012, the porch was enclosed to form an east addition to the residence.

The Telford family migrated to Ramona in the 1890s. Census records and city directories indicate that George Telford moved to Ramona between 1890 and 1892. Further, Carrico and Flanigan (1991) note that Telford moved to Ramona in 1891 and subsequently constructed the 915 Ninth Street residence. The building record for the property indicates that the 915 Ninth Street residence was constructed between 1888 and 1900. According to Carrico and Flanigan (1991), the barn within the property was constructed prior to Telford purchasing the subject property, and the building record indicates that the barn was built in 1890, a year before Telford moved to Ramona. Therefore, the architect and builder of the barn is unknown. The building record also indicates that the well house was constructed in 1900, contemporaneous with the residence. The remaining ancillary structures were built after the Kelly family purchased the property.

Because the property was initially developed with the primary structures, a single-family residence and barn, during the late nineteenth century by an early resident of Ramona, the property is considered to represent the theme of early rural architecture in Ramona and San Diego County. Although the 915 Ninth Street residence does not represent a unique or excellent example of a Victorian building and does not retain integrity of design or materials, the building continues to reflect the period in which it was constructed and early Ramona architecture. Therefore, the 915 Ninth Street residence remains eligible for designation under CRHR Criterion 3 as determined by Carrico and Flanigan (1991).

The condition of the 915 Ninth Street barn has resulted in a loss of integrity of materials, design, and feeling to the extent which the structure no longer represents its original workmanship and therefore no longer embodies distinctive characteristics of its period of construction. In addition, the ancillary structures, collectively do not retain integrity of design, materials, or association and never retained integrity of workmanship. Further, the barn and ancillary structures do not possess artistic value of architectural distinction. Therefore, the 915 Ninth Street barn and ancillary structures are not eligible for designation under CRHR Criterion 3, and the removal of these structures will not negatively affect the eligibility of the remaining 915 Ninth

Street residence, which continues to collectively represent its era of construction.

- **CRHR Criterion 4:**
  It has yielded, or may be likely to yield, information important in prehistory or history.

  The research conducted for this study revealed that the residence, barn, and ancillary structures located within the 915 Ninth Street property are not associated with any significant persons or events and were not constructed using unique or innovative methods of construction. They are also not likely to yield any additional information about the history of Ramona or the state of California. Therefore, the 915 Ninth Street property is not eligible for designation under CRHR Criterion 4.

Findings and Conclusions

The 915 Ninth Street residence was evaluated as eligible for listing on the CRHR under Criterion 3. This conclusion concurs with Carrico and Flanigan's (1991) evaluation of the single-family residence in the Ramona Historic Resource Inventory report. As designed, the residence will not be impacted by the proposed development. Due to the condition of the barn and ancillary structures, which has resulted in an overall loss of integrity, coupled with the lack of noteworthy architectural elements and a representation of a recognized style, the 915 Ninth Street barn and ancillary structures are not eligible for listing in the CRHR, and no mitigation measures are required for their proposed demolition. Further, the removal of the barn and ancillary structures will not negatively impact the eligibility of the 915 Ninth Street residence, as it continues to represent the early rural architectural period in which it was constructed. The barn and ancillary structures are no longer considered contributing elements of the property due to their deterioration and loss of overall integrity.

4.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION

4.1 Resource Importance

The survey of the 915 Ninth Street Project relocated historic resource P-37-029271. Site P-37-029271 consists of the 915 Ninth Street single-family property, which includes a residence, a barn, and four ancillary structures (a water tank house, a well pump house, a storage shed, and a woodshed). As designed, the barn and four ancillary structures will be removed as part of the proposed development, and the single-family residence will remain. The single-family residence associated with the historic 915 Ninth Street property was determined to remain eligible under CRHR Criterion 3, and the barn and ancillary structures were determined not significant or CRHR-eligible. The removal of the barn and ancillary structures will not negatively impact the eligibility of the 915 Ninth Street single-family residence for the CRHR. Therefore, Site P-37-029271 requires no further study and no mitigation measures are required for the removal of the barn and ancillary structures.

The survey also resulted in the identification of one prehistoric bedrock milling feature (Site Temp-1) and one historic well head isolate (Iso-1). As an isolate, Iso-1 is not eligible for the CRHR and not considered a Historical Resource as defined by CEQA. Therefore, no further study is required for the removal of the historic well head. Site Temp-1 has not been evaluated for eligibility to the CRHR or in accordance with the RPO. The cultural resources identified within the project have been plotted on the project development map in Figure 4.1–1.

4.2 Impact Identification

Based upon the survey results, the approximately 19.65-acre development will impact one prehistoric archaeological resource (Site Temp-1), one historic resource (P-37-029271), and one historic isolate (Iso-1). As such, it is recommended that a focused significance evaluation be required for Temp-1 in accordance with CRHR criteria and the RPO prior to development of the project.

Carrico and Flanigan (1991) recorded the 915 Ninth Street barn and single-family residence as Site P-37-029271 and determined the resource to be eligible under CRHR Criterion 3. As designed, the 915 Ninth Street barn and ancillary structures will be removed by the proposed project, while the residence will remain intact in its present location. The historic-age barn and ancillary structures have been evaluated as not significant and are thus not considered CRHR-eligible. Further, the removal of the barn and ancillary structures will not negatively impact the eligibility of the 915 Ninth Street residence for the CRHR as the single-family residence continues to represent the early rural architectural period in which it was constructed. Further, Iso-1 is not eligible for the CRHR. Therefore, no significant historic resources will be impacted by the proposed project.

Figure 4.1–1
Cultural Resources on the Project Development Map

(Deleted for Public Review; Bound Separately)

4.2.1 Native American Heritage Values

A SLF search was requested from the NAHC on June 30, 2025, to identify the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within the vicinity of the project. The SLF search request was received with negative results. The NAHC suggested contacting local Native American groups for further information. On December 2, 2025, BFSA sent information requests to the list of Native American groups provided by the NAHC. Two responses have since been received (Appendix D). The Rincon Band of Luiseño Indians noted the project is outside of their "Area of Historic Interest" and deferred to more local groups. The Viejas Band of Kumeyaay Indians stated that the area may contain sacred sites but did not provide any further information, requesting that sacred sites be avoided, all applicable laws be followed, and the tribe be notified of inadvertent discoveries. The County of San Diego will also engage in Native American consultation through the CEQA AB 52 process.

5.0 MANAGEMENT CONSIDERATIONS – MITIGATION MEASURES AND DESIGN CONSIDERATIONS

5.1 Mitigable Impacts

The development footprint for the 915 Ninth Street Project is designed to impact the historic barn and ancillary structures associated with the 915 Ninth Street single-family property (P-37-029271), one historic isolate (Iso-1), and one prehistoric archaeological resource (Site Temp-1). Due to the impacts of the proposed project on the 915 Ninth Street barn and ancillary structures, the 915 Ninth Street property (P-37-029271) was evaluated under CRHR criteria. It was determined that, while the 915 Ninth Street single-family residence remains eligible under CRHR Criterion 3, the 915 Ninth Street barn, woodshed, water tank house, storage shed, and pump house are not significant or eligible for the CRHR. Although the removal of the barn and ancillary structures will result in an indirect impact to the remainder of the 915 Ninth Street property, the demolition of the barn and ancillary structures will not negatively affect the eligibility of the 915 Ninth Street property for the CRHR, as the remaining single-family residence continues to embody the historic period of its construction. Therefore, no significant historic resources will be impacted by the proposed project development. A Use, Maintenance, and Repair easement is recommended for the protection and preservation of the residence. Further, no mitigation measures are required for the demolition of the barn and ancillary structures. As such, no further study is required for Site P-37-029271.

The County of San Diego's preferred management of cultural resources is avoidance and preservation incorporated into project design. However, based upon the design limitations of the current project, archaeological Site Temp-1 cannot be preserved through project design and avoidance as it would result in the loss of a residential unit. Therefore, Site Temp-1 requires evaluation under CRHR criteria and the RPO prior to the development of the subject property. The resource should be tested and evaluated to determine whether subsurface deposits are present, to define site boundaries, and to assess resource significance. The presence and nature of any subsurface component of the prehistoric Site Temp-1 is unknown; therefore, the potential significance is unknown until significance testing is conducted for the resource. For the current project, specific potential impacts upon significant resources cannot be identified until resource significance has been determined through testing and evaluation. As an isolate, Iso-1 is not eligible for the CRHR and therefore does not require further evaluation.

5.2 Recommended Mitigation Measures

Because the barn and ancillary structures associated with Site P-37-029271 have been evaluated as not CRHR-eligible and the remainder of the historic 915 Ninth Street property will not be directly affected by the development, no mitigation measures are recommended for the resource. To protect and preserve the residence, it is recommended that a Use, Maintenance, and Repair easement be placed over the residence. However, the appropriate study and evaluation of

Site Temp-1 found within the project has not occurred. Therefore, appropriate mitigation measures, if any should be required, cannot be recommended at this time. Until evaluation of the identified resource's importance has been completed, mitigation measures and/or design considerations involving impacts to cultural resources cannot be formulated. While the County of San Diego considers preservation of cultural resources through project design as the preferred mitigation strategy to avoid impacts, should avoidance not prove feasible at any site determined to be significant, a data recovery program for archaeological resources, or a documentation program of historic period structures and features, must be developed and implemented prior to the proposed activities.

Regardless of the results of any focused studies of the cultural resources within the property, it is recommended that all future grading or earthwork within the project be subject to an archaeological and tribal monitoring program. The records search results and pedestrian survey found that the property was previously used for residential purposes as early as 1890. These impacts to the subject property occurred prior to CEQA and the adoption of environmental laws requiring the appropriate identification and handling of cultural resources. This characterization of the property as superficially disturbed is relevant to the consideration of cultural resources being present within the project. When parcels are cleared, disced, or otherwise disturbed, evidence of surface artifact scatters is lost. Regardless of whether cultural resources have ever existed within this property, the current state of the area appears to have affected the potential to discover any surface scatters of artifacts. Therefore, given the uncertainty of prior impact levels to the property, coupled with the property's location near natural sources of water and the presence of a prehistoric resource within the project, archaeological and tribal monitoring of grading is recommended.

5.3 Native American Heritage Resources/Traditional Properties

BFSA requested a review of the SLF by the NAHC, which has been received with negative results (Appendix D). The NAHC suggested contacting local Native American groups for further information. On December 2, 2025, BFSA sent information requests to the list of Native American groups provided by the NAHC. As of yet, no responses have been received. The County of San Diego will conduct outreach with local tribes pursuant to AB 52, if required.

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7.0 LIST OF PREPARERS AND ORGANIZATIONS CONTACTED

The archaeological survey program for the 915 Ninth Street Project was directed by Principal Investigator Tracy A. Stropes, M.A., RPA and Principal Historian Jennifer R.K. Stropes, M.S., RPA. The archaeological fieldwork was conducted by BFSA archaeologist John Baber with assistance from Native American monitor Gage Baay, a Kumeyaay representative from Redtail. The report text was prepared by Kathleen Krogh, Jennifer R.K. Stropes, Tracy A. Stropes and Brian F Smith. Report graphics were provided by Kathleen Krogh. Technical editing and report production were conducted by Payton Swanson. The SCIC at SDSU provided the archaeological records search information.

8.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Resource	Mitigation Measures	Design Considerations
P-37-029271	The 915 Ninth Street single-family residence remains eligible under CRHR Criterion 3. However, the 915 Ninth Street barn, water tank house, pump house, storage shed, and woodshed were determined not significant or CRHR-eligible. It was determined that the removal of the barn and ancillary structures will not negatively affect the eligibility of the remaining 915 Ninth Street property for the CRHR. As such, no mitigation measures for the barn and ancillary structures are recommended. As designed, the single-family residence will not be impacted by the proposed development. It is recommended for the protection and preservation of the residence and remaining ancillary structures that a Use, Maintenance, and Repair easement be placed over them.	None
Temp-1	Cannot be determined at the present: It is recommended that the prehistoric bedrock milling feature within the property be evaluated under CRHR criteria and the RPO prior to development of the project to determine appropriate, if necessary, mitigation measures.	Must be considered after Site Temp-1 has been appropriately evaluated for significance.
Iso-1	The historic isolate is not eligible for the CRHR. As such, no mitigation measures for the isolate are recommended.	None
General property	The potential exists that unrecorded cultural resources could be encountered during grading. As a condition of approval, an archaeological and tribal monitoring program should be required to mitigate impacts to cultural resources uncovered during grading.	None

APPENDIX A

Qualifications of Key Personnel

Brian F. Smith, MA

Senior Advisor

BFSA Environmental Services, a Perennial Company
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BFSA Environmental Services
A Perennial Company

Education

Master of Arts, History **1982**

University of San Diego, California

Bachelor of Arts, History, and Anthropology **1975**

University of San Diego, California

Professional Memberships

Society for California Archaeology

Experience

President/Principal Investigator **1977–2024**
BFSA Environmental Services, a Perennial Company **Poway, California**

Brian F. Smith served as the president and principal historical and archaeological consultant for BFSA Environmental Services. For more than 32 years, he conducted over 2,500 cultural resource studies in California, Arizona, Nevada, Montana, and Texas. These studies included every possible aspect of archaeology from literature searches and large-scale surveys to intensive data recovery excavations. Reports prepared by Mr. Smith have been submitted to all facets of local, state, and federal review agencies, including the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Reclamation, the Department of Defense, and the Department of Homeland Security. In addition, Mr. Smith has conducted studies for utility companies (Sempra Energy) and state highway departments (CalTrans).

Professional Accomplishments

These selected major professional accomplishments represent research efforts that have added significantly to the body of knowledge concerning the prehistoric life ways of cultures once present in the southern California area and historic settlement since the late eighteenth century. Mr. Smith has been principal investigator on the following select projects, except where noted.

Hanford Nuclear Site at the Washington Closure Hanford Project, Washington: As part of the massive remediation project at the nuclear site, BFSA prepared a mitigation monitoring plan for the removal of the historic dump site associated with the Hanford Construction Camp occupied from 1943 to 1945 as part of the Manhattan Project to develop the atom bomb. The monitoring plan was implemented and resulted in the completion of a report entitled “Atomic Archaeology: The Manhattan Project’s Hanford Engineer Works Construction Camp Historic Landfill Study” (2012) that documented the material discards of the 50,000 people the occupied the camp and constructed the reactors needed for atomic weapons.

Downtown San Diego Mitigation and Monitoring Reporting Programs: Large numbers of downtown San Diego mitigation and monitoring projects, some of which included Broadway Block (2019), 915 Grape Street (2019), 1919 Pacific Highway (2018), Moxy Hotel (2018), Makers Quarter Block D (2017), Ballpark Village (2017), 460 16th Street (2017), Kettner and Ash (2017), Bayside Fire Station (2017), Pinnacle on the Park (2017), IDEA1 (2016), Blue Sky San Diego (2016), Pacific Gate (2016), Pendry Hotel (2015), Cisterra Sempra Office Tower (2014), 15th and Island (2014), Park and G (2014), Comm 22 (2014), 7th and F Street Parking (2013), Ariel Suites (2013), 13th and Marker (2012), Strata (2008), Hotel Indigo (2008), Lofts at 707 10th Avenue Project (2007), Breeza (2007), Bayside at the Embarcadero (2007), Aria (2007), Icon (2007), Vantage Pointe (2007), Aperture (2007), Sapphire Tower (2007), Lofts at 655 Sixth Avenue (2007), Metrowork (2007), The Legend (2006), The Mark (2006), Smart Corner (2006), Lofts at 677 7th Avenue (2005), Aloft on Cortez Hill (2005), Front and Beech Apartments (2003), Bella Via Condominiums (2003), Acqua Vista Residential Tower (2003), Northblock Lofts (2003), Westin Park Place Hotel (2001), Parkloft Apartment Complex (2001), Renaissance Park (2001), and Laurel Bay Apartments (2001).

1900 and 1912 Spindrift Drive: An extensive data recovery and mitigation monitoring program at the Spindrift Site, an important prehistoric archaeological habitation site stretching across the La Jolla area. The project resulted in the discovery of over 20,000 artifacts and nearly 100,000 grams of bulk faunal remains and marine shell, indicating a substantial occupation area (2013-2014).

San Diego Airport Development Project: An extensive historic assessment of multiple buildings at the San Diego International Airport and included the preparation of Historic American Buildings Survey documentation to preserve significant elements of the airport prior to demolition (2017-2018).

Citracado Parkway Extension: A still-ongoing project in the city of Escondido to mitigate impacts to an important archaeological occupation site. Various archaeological studies have been conducted by BFSA resulting in the identification of a significant cultural deposit within the project area.

Westin Hotel and Timeshare (Grand Pacific Resorts): Data recovery and mitigation monitoring program in the city of Carlsbad consisted of the excavation of 176 one-square-meter archaeological data recovery units which produced thousands of prehistoric artifacts and ecofacts, and resulted in the preservation of a significant prehistoric habitation site. The artifacts recovered from the site presented important new data about the prehistory of the region and Native American occupation in the area (2017).

The Everly Subdivision Project: Data recovery and mitigation monitoring program in the city of El Cajon resulted in the identification of a significant prehistoric occupation site from both the Late Prehistoric and Archaic Periods, as well as producing historic artifacts that correspond to the use of the property since 1886. The project produced an unprecedented quantity of artifacts in comparison to the area encompassed by the site, but lacked characteristics that typically reflect intense occupation, indicating that the site was used intensively for food processing (2014-2015).

Ballpark Village: A mitigation and monitoring program within three city blocks in the East Village area of San Diego resulting in the discovery of a significant historic deposit. Nearly 5,000 historic artifacts and over 500,000 grams of bulk historic building fragments, food waste, and other materials representing an occupation period between 1880 and 1917 were recovered (2015-2017).

Archaeology at the Padres Ballpark: Involved the analysis of historic resources within a seven-block area of the "East Village" area of San Diego, where occupation spanned a period from the 1870s to the 1940s. Over a period of two years, BFSA recovered over 200,000 artifacts and hundreds of pounds of metal, construction debris, unidentified broken glass, and wood. Collectively, the Ballpark Project and the other downtown mitigation and monitoring projects represent the largest historical archaeological program anywhere in the country in the past decade (2000-2007).

4S Ranch Archaeological and Historical Cultural Resources Study: Data recovery program consisted of the excavation of over 2,000 square meters of archaeological deposits that produced over one million artifacts, containing primarily prehistoric materials. The archaeological program at 4S Ranch is the largest archaeological study ever undertaken in the San Diego County area and has produced data that has exceeded expectations regarding the resolution of long-standing research questions and regional prehistoric settlement patterns.

Charles H. Brown Site: Attracted international attention to the discovery of evidence of the antiquity of man in North America. Site located in Mission Valley, in the city of San Diego.

Del Mar Man Site: Study of the now famous Early Man Site in Del Mar, California, for the San Diego Science Foundation and the San Diego Museum of Man, under the direction of Dr. Spencer Rogers and Dr. James R. Moriarty.

Old Town State Park Projects: Consulting Historical Archaeologist. Projects completed in the Old Town State Park involved development of individual lots for commercial enterprises. The projects completed in Old Town include Archaeological and Historical Site Assessment for the Great Wall Cafe (1992), Archaeological Study for the Old Town Commercial Project (1991), and Cultural Resources Site Survey at the Old San Diego Inn (1988).

Site W-20, Del Mar, California: A two-year-long investigation of a major prehistoric site in the Del Mar area of the city of San Diego. This research effort documented the earliest practice of religious/ceremonial activities in San Diego County (circa 6,000 years ago), facilitated the projection of major non-material aspects of the La Jolla Complex, and revealed the pattern of civilization at this site over a continuous period of 5,000 years. The report for the investigation included over 600 pages, with nearly 500,000 words of text, illustrations, maps, and photographs documenting this major study.

City of San Diego Reclaimed Water Distribution System: A cultural resource study of nearly 400 miles of pipeline in the city and county of San Diego.

Master Environmental Assessment Project, City of Poway: Conducted for the City of Poway to produce a complete inventory of all recorded historic and prehistoric properties within the city. The information was used in conjunction with the City's General Plan Update to produce a map matrix of the city showing areas of high, moderate, and low potential for the presence of cultural resources. The effort also included the development of the City's Cultural Resource Guidelines, which were adopted as City policy.

Draft of the City of Carlsbad Historical and Archaeological Guidelines: Contracted by the City of Carlsbad to produce the draft of the City's historical and archaeological guidelines for use by the Planning Department of the City.

The Mid-Bayfront Project for the City of Chula Vista: Involved a large expanse of undeveloped agricultural land situated between the railroad and San Diego Bay in the northwestern portion of the city. The study included the analysis of some potentially historic features and numerous prehistoric

Cultural Resources Survey and Test of Sites Within the Proposed Development of the Audie Murphy Ranch, Riverside County, California: Project manager/director of the investigation of 1,113.4 acres and 43 sites, both prehistoric and historic—included project coordination; direction of field crews; evaluation of sites for significance based on County of Riverside and CEQA guidelines; assessment of cupule, pictograph, and rock shelter sites, co-authoring of cultural resources project report. February- September 2002.

Cultural Resources Evaluation of Sites Within the Proposed Development of the Otay Ranch Village 13 Project, San Diego County, California: Project manager/director of the investigation of 1,947 acres and 76 sites, both prehistoric and historic—included project coordination and budgeting; direction of field

crews; assessment of sites for significance based on County of San Diego and CEQA guidelines; co-authoring of cultural resources project report. May-November 2002.

Cultural Resources Survey for the Remote Video Surveillance Project, El Centro Sector, Imperial County: Project manager/director for a survey of 29 individual sites near the U.S./Mexico Border for proposed video surveillance camera locations associated with the San Diego Border barrier Project—project coordination and budgeting; direction of field crews; site identification and recordation; assessment of potential impacts to cultural resources; meeting and coordinating with U.S. Army Corps of Engineers, U.S. Border Patrol, and other government agencies involved; co-authoring of cultural resources project report. January, February, and July 2002.

Cultural Resources Survey and Test of Sites Within the Proposed Development of the Menifee West GPA, Riverside County, California: Project manager/director of the investigation of nine sites, both prehistoric and historic—included project coordination and budgeting; direction of field crews; assessment of sites for significance based on County of Riverside and CEQA guidelines; historic research; co-authoring of cultural resources project report. January-March 2002.

Cultural Resources Survey and Test of Sites Within the Proposed French Valley Specific Plan/EIR, Riverside County, California: Project manager/director of the investigation of two prehistoric and three historic sites—included project coordination and budgeting; survey of project area; Native American consultation; direction of field crews; assessment of sites for significance based on CEQA guidelines; cultural resources project report in prep. July-August 2000.

Cultural Resources Survey and Test of Sites Within the Proposed Development of the Menifee Ranch, Riverside County, California: Project manager/director of the investigation of one prehistoric and five historic sites—included project coordination and budgeting; direction of field crews; feature recordation; historic structure assessments; assessment of sites for significance based on CEQA guidelines; historic research; co-authoring of cultural resources project report. February-June 2000.

Salvage Mitigation of a Portion of the San Diego Presidio Identified During Water Pipe Construction for the City of San Diego, California: Project archaeologist/director—included direction of field crews; development and completion of data recovery program; management of artifact collections cataloging and curation; data synthesis and authoring of cultural resources project report in prep. April 2000.

Enhanced Cultural Resource Survey and Evaluation for the Tyrian 3 Project, La Jolla, California: Project manager/director of the investigation of a single-dwelling parcel—included project coordination; assessment of parcel for potentially buried cultural deposits; authoring of cultural resources project report. April 2000.

Enhanced Cultural Resource Survey and Evaluation for the Lamont 5 Project, Pacific Beach, California: Project manager/director of the investigation of a single-dwelling parcel—included project coordination; assessment of parcel for potentially buried cultural deposits; authoring of cultural resources project report. April 2000.

Enhanced Cultural Resource Survey and Evaluation for the Reiss Residence Project, La Jolla, California: Project manager/director of the investigation of a single-dwelling parcel—included project coordination; assessment of parcel for potentially buried cultural deposits; authoring of cultural resources project report. March-April 2000.

Salvage Mitigation of a Portion of Site SDM-W-95 (CA-SDI-211) for the Poinsettia Shores Santalina Development Project and Caltrans, Carlsbad, California: Project archaeologist/ director—included direction of field crews; development and completion of data recovery program; management of artifact collections cataloging and curation; data synthesis and authoring of cultural resources project report in prep.

December 1999-January 2000.

Survey and Testing of Two Prehistoric Cultural Resources for the Airway Truck Parking Project, Otay Mesa, California: Project archaeologist/director—included direction of field crews; development and completion of testing recovery program; assessment of site for significance based on CEQA guidelines; authoring of cultural resources project report, in prep. December 1999-January 2000.

Cultural Resources Phase I and II Investigations for the Tin Can Hill Segment of the Immigration and Naturalization Services Triple Fence Project Along the International Border, San Diego County, California: Project manager/director for a survey and testing of a prehistoric quarry site along the border—NRHP eligibility assessment; project coordination and budgeting; direction of field crews; feature recordation; meeting and coordinating with U.S. Army Corps of Engineers; co-authoring of cultural resources project report. December 1999-January 2000.

Mitigation of a Prehistoric Cultural Resource for the Westview High School Project for the City of San Diego, California: Project archaeologist/ director—included direction of field crews; development and completion of data recovery program including collection of material for specialized faunal and botanical analyses; assessment of sites for significance based on CEQA guidelines; management of artifact collections cataloging and curation; data synthesis; co-authoring of cultural resources project report, in prep. October 1999-January 2000.

Mitigation of a Prehistoric Cultural Resource for the Otay Ranch SPA-One West Project for the City of Chula Vista, California: Project archaeologist/director—included direction of field crews; development of data recovery program; management of artifact collections cataloging and curation; assessment of site for significance based on CEQA guidelines; data synthesis; authoring of cultural resources project report, in prep. September 1999-January 2000.

Monitoring of Grading for the Herschel Place Project, La Jolla, California: Project archaeologist/ monitor—included monitoring of grading activities associated with the development of a single- dwelling parcel. September 1999.

Survey and Testing of a Historic Resource for the Osterkamp Development Project, Valley Center, California: Project archaeologist/ director—included direction of field crews; development and completion of data recovery program; budget development; assessment of site for significance based on CEQA guidelines; management of artifact collections cataloging and curation; data synthesis; authoring of cultural resources project report. July-August 1999.

Survey and Testing of a Prehistoric Cultural Resource for the Proposed College Boulevard Alignment Project, Carlsbad, California: Project manager/director —included direction of field crews; development and completion of testing recovery program; assessment of site for significance based on CEQA guidelines; management of artifact collections cataloging and curation; data synthesis; authoring of cultural resources project report, in prep. July-August 1999.

Survey and Evaluation of Cultural Resources for the Palomar Christian Conference Center Project, Palomar Mountain, California: Project archaeologist—included direction of field crews; assessment of sites for significance based on CEQA guidelines; management of artifact collections cataloging and curation; data synthesis; authoring of cultural resources project report. July-August 1999.

Cultural Resources Phase I, II, and III Investigations for the Immigration and Naturalization Services Triple Fence Project Along the International Border, San Diego County, California: Project manager/director for the survey, testing, and mitigation of sites along border—supervision of multiple field crews, NRHP eligibility assessments, Native American consultation, contribution to Environmental Assessment document, lithic and marine shell analysis, authoring of cultural resources project report. August 1997-

January 2000.

Phase I, II, and II Investigations for the Scripps Poway Parkway East Project, Poway California: Project archaeologist/project director—included recordation and assessment of multicomponent prehistoric and historic sites; direction of Phase II and III investigations; direction of laboratory analyses including prehistoric and historic collections; curation of collections; data synthesis; co-authorship of final cultural resources report. February 1994; March-September 1994; September-December 1995.

APPENDIX B

Site Record Forms

(Deleted for Public Review; Bound Separately)

APPENDIX C

Archaeological Records Search Results

(Deleted for Public Review; Bound Separately)

APPENDIX D

NAHC Sacred Lands File Search Results

(Deleted for Public Review; Bound Separately)

APPENDIX E

Confidential Maps and Plates

(Deleted for Public Review; Bound Separately)